# Health Insurance Exchange

# Quality Rating System and Qualified Health Plan Enrollee Experience Survey: Technical Guidance for 2021

September 2020

# **Document Change Log**

Description	Date
Release of the <i>Quality Rating System and Qualified Health Plan Enrollee Experience Survey:</i> Technical Guidance for 2021. This guidance addresses requirements for 2021, which include data submission in the 2021 calendar year for quality rating information that will be publicly reported by the Exchanges, beginning during the open enrollment period for the 2022 Plan Year.	09/30/2020

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# **Technical Assistance**

Please see the instructions below for submitting questions regarding this document or any requirements related to the Quality Rating System (QRS) and the Qualified Health Plan (QHP) Enrollee Experience Survey (QHP Enrollee Survey):

- **OHP** issuers: Please submit questions to the Marketplace Service Desk (MSD) via email to CMS\_FEPS@cms.hhs.gov or via phone at 1-855-CMS-1515 (1-855-267-1515). Please reference "Marketplace Quality Initiatives (MQI)-QRS" in the subject line.
- State-based Exchanges (SBEs): Please submit questions to your respective State Officers.
- Federally-facilitated Exchanges (FFEs) and State-based Exchanges on the Federal Platform (SBE-FPs): Please submit questions via email to the MSD at CMS FEPS@cms.hhs.gov and reference "Marketplace Quality Initiatives (MQI)-QRS" in the subject line.
- Other stakeholders: Please submit questions via email to Marketplace Quality@cms.hhs.gov and reference "Marketplace Quality Initiatives (MQI)-QRS" in the subject line.

# **Accompanying Documents**

The accompanying document, the 2021 Quality Rating System Measure Technical Specifications, details QRS clinical measure and QRS survey measure specifications and guidelines for data collection. The document can be found on the Centers for Medicare & Medicaid Services (CMS) Health Insurance MQI website (link in the table below). For questions on individual measures, please contact the appropriate measure stewards via the contact information listed in the technical specifications.

#### **Website Links**

The following resources provide additional details related to the QRS and QHP Enrollee Survey.

Website	Description	Link
CMS MQI website	This website provides resources related to CMS MQI activities, including the QRS, the QHP Enrollee Survey, Quality Improvement Strategy (QIS) requirements, and patient safety standards. As the central site for QRS resources, this site contains instructional documents regarding QRS implementation and reporting, including this document, the 2021 Quality Rating System Measure Technical Specifications, and the Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021.	https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/ACA-MQI/ACA-MQI-Landing-Page
National Committee for Quality Assurance (NCQA) Healthcare Effectiveness Data and Information Set (HEDIS®) <sup>1</sup> Compliance Audit <sup>TM</sup> website	This website provides additional information related to data validation, including the data validator contracting process, as well as HEDIS® Compliance Audit <sup>TM</sup> standards, policies, and procedures.	https://www.ncqa.org/progra ms/data-and-information- technology/hit-and-data- certification/hedis- compliance-audit- certification/

<sup>&</sup>lt;sup>1</sup> HEDIS<sup>®</sup> is a registered trademark of the National Committee for Quality Assurance (NCQA).

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Website	Description	Link
Registration for Technical Assistance Portal (REGTAP)	technical assistance related to Exchange and Premium Stabilization Program requirements. Registered users can access the library, frequently asked questions, training resources, and the inquiry tracking and management system. Use key word search "Quality Rating System" to identify any resources related to the QRS.	
State Exchange Resource Virtual Information System (SERVIS)	This website serves as an information hub for CMS technical assistance related to SBE requirements. Registered State users can access relevant resources organized by the Center for Consumer Information and Insurance Oversight (CCIIO) State Marketplace and Insurance Programs Group.	https://portal.cms.gov/ (registration required)

# 1. Document Purpose and Scope

This Quality Rating System and Qualified Health Plan Enrollee Experience Survey: Technical Guidance for 2021 (2021 Guidance) document provides technical guidance regarding the Quality Rating System (QRS) and Qualified Health Plan (QHP) Enrollee Experience Survey (QHP Enrollee Survey) for 2021. It specifies QRS and QHP Enrollee Survey requirements for QHP issuers offering coverage through the Health Insurance Exchanges (Exchanges) (also known as the Health Insurance Marketplace <sup>®2</sup>). Unless the context indicates otherwise, the term "Exchanges" refers to the Federally-facilitated Exchanges (FFEs) (inclusive of FFEs where the State performs plan management functions) and the State Exchanges. State Exchanges are inclusive of State-based Exchanges (SBEs), which operate their own technology platform, and State-based Exchanges on the Federal Platform (SBE-FPs).

The 2021 Guidance communicates 2021 QRS requirements and includes QRS program refinements (including refinements to the QHP Enrollee Survey) described in the *Final 2020 Call Letter for the QRS and QHP Enrollee Survey* (Final 2020 QRS Call Letter), published in August 2020,<sup>3</sup> as applicable. Section 1.1 of this document highlights all key differences between the 2020 and 2021 Guidance. CMS anticipates issuing guidance at least annually in the fall before the year of data submission.

The primary audience for the 2021 Guidance is QHP issuers, but this document also includes information relevant to other stakeholders involved with QRS and QHP Enrollee Survey implementation (e.g., SBEs, data validators, Department of Health & Human Services [HHS]-approved survey vendors). The 2021 Guidance addresses requirements for 2021, which include data submission in the 2021 calendar year for ratings for the 2022 Plan Year.

The requirements outlined in this document are based on statute and Centers for Medicare & Medicaid Services (CMS) regulation, including the "Patient Protection and Affordable Care Act; Exchange and Insurance Market Standards for 2015 and Beyond" Final Rule.<sup>4</sup>

## 1.1 Section Guide

In addition to the initial background sections, this document includes the information noted below. Where applicable, the section descriptions highlight key differences between the 2020 Guidance<sup>5</sup> and 2021 Guidance.

<sup>&</sup>lt;sup>2</sup> Health Insurance Marketplace<sup>®</sup> is a registered service mark of the U.S. Department of Health & Human Services

<sup>&</sup>lt;sup>3</sup> The Final 2020 QRS Call Letter is available at <a href="https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html">https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html</a>.

<sup>&</sup>lt;sup>4</sup> Patient Protection and Affordable Care Act; Exchange and Insurance Market Standards for 2015 and Beyond; Final Rule; 79 FR 30240 at 30352 (May 27, 2014) (45 C.F.R. Parts 144, 146, 147, et al.).

<sup>&</sup>lt;sup>5</sup> The term "2020 Guidance" refers to all CMS sub-regulatory guidance applicable to the 2020 ratings year, including the *Quality Rating System and Qualified Health Plan Enrollee Survey: Technical Guidance for 2020*; the August 11, 2020 *Quality Rating Information Bulletin*; the COVID-19 Marketplace Quality Initiative Memo; and other CMS guidance (e.g., frequently asked questions [FAQs] available on REGTAP).

- Section 4. Implementation Schedule for the QRS and QHP Enrollee Survey: This section provides a snapshot of the implementation process, key dates, and the stakeholder(s) with primary responsibility for critical action(s).
- Section 5. Exchange Oversight Responsibilities: This section describes Exchange responsibilities related to the QRS and QHP Enrollee Survey.
- Section 6. QRS and QHP Enrollee Survey Requirements: This section outlines the criteria for determining which QHP issuers are required to collect and submit validated QRS clinical measure data and QHP Enrollee Survey response data to CMS. This section also describes the QRS measure set and details the requirements for data collection, data validation, and data submission for the QRS and the QHP Enrollee Survey. The key differences outlined in the text boxes below reflect changes to the QHP Enrollee Survey sample frame to align with the *Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021* and QRS measure set to align with changes finalized in the Final 2020 QRS Call Letter. 6

# **Key Differences in QRS and QHP Enrollee Survey Requirements Between the 2020 Guidance and the 2021 Guidance**

#### **QRS and QHP Enrollee Survey Requirements:**

In April 2020, CMS published the COVID-19 Marketplace Quality Initiatives Memo, <sup>7</sup> which announced CMS' temporary policy of relaxed enforcement due to the challenges health care providers have been facing responding to the COVID-19 virus, and directed all eligible QHP issuers to discontinue the collection of clinical quality measure data and survey measure data that would normally be used to calculate 2020 quality ratings and that would normally be reported to CMS between May and June 2020. This enforcement discretion policy included discontinuation of reporting data for the QRS and QHP Enrollee Survey that would be used to calculate the quality ratings for display on Exchange websites beginning during the 2021 open enrollment period for the individual market.<sup>8</sup>

For the 2021 QRS, CMS will enforce compliance with the QRS and QHP Enrollee Survey requirements. All eligible QHP issuers are required to collect and report validated QRS clinical measure data and QHP Enrollee Survey response data to CMS between May and June 2021.

## **Participation Criteria:**

For the 2020 QRS, CMS did not explicitly address applicability of QRS and QHP Enrollee Survey requirements to the basic health program (BHP) and whether QHP issuers should include BHP enrollees in their QRS data submissions.

<sup>&</sup>lt;sup>6</sup> See the Final 2020 Call Letter, available at: https://www.cms.gov/files/document/final-2020-call-letter-quality-rating-system-qrs-and-qualified-health-plan-enrollee-experience.pdf

<sup>&</sup>lt;sup>7</sup> See the COVID-19 Marketplace Quality Initiatives Memo, available at: <a href="https://www.cms.gov/files/document/covid-qrs-and-marketplace-quality-initiatives-memo-final.pdf">https://www.cms.gov/files/document/covid-qrs-and-marketplace-quality-initiatives-memo-final.pdf</a> <sup>8</sup> *Id*.

For the 2021 QRS, CMS is clarifying that QRS and QHP Enrollee Survey requirements do not apply to the BHP; therefore, QHP issuers should not include BHP enrollees in their QRS data submissions.

#### **Measures Removed from the QRS Measure Set:**

In the Final 2020 QRS Call Letter, CMS announced the removal of two measures, *Adult Body Mass Index (BMI) Assessment* (ABA) and *Medication Management for People with Asthma (75% of Treatment Period)* (MMA), from the QRS measure set beginning with the 2021 QRS ratings year. QHP issuers are not required to submit data for either measure as part of the 2021 QRS data submission.<sup>9</sup>

#### **Addition of New Measures:**

In the Final 2020 QRS Call Letter, CMS announced the addition of two measures, *Annual Monitoring for Persons on Long-term Opioid Therapy* (AMO) and *Asthma Medication Ratio* (AMR), to the QRS measure set beginning with the 2021 QRS ratings year. QHP issuers are required to submit data for the AMO and AMR measures as part of the 2021 QRS data submission.<sup>10</sup>

## **Scoring Eligibility:**

Due to the COVID-19 public health emergency and CMS' decision to suspend collection of clinical quality measure data and survey measure data that would normally be reported between May and June 2020, <sup>11</sup> CMS is effectuating a change to the 2021 QRS scoring eligibility criteria via this Technical Guidance to ensure continued alignment with the general QRS scoring eligibility criteria.

Under normal operations, reporting units are eligible to receive QRS scores and ratings beginning with their third consecutive year of operation on the Exchange. However, due to the suspension of 2020 QRS data collection, reporting units in their second year of operation were unable to submit data for the first time during the 2020 QRS ratings year. Therefore, in recognition of the impact of the COVID-19 public health emergency, CMS is amending the scoring eligibility criteria such that the 2020 ratings year will not count toward scoring eligibility. As a result, reporting units will be considered scoring eligible if they were operational on the Exchange in 2018, 2019, and 2021, and meet the minimum enrollment criteria. CMS considers this to be a non-significant change to the scoring eligibility criteria, as this modification does not apply to QRS data submission eligibility or otherwise change any applicable issuer QRS requirements.

CMS previously finalized the addition of the *International Normalized Ratio Monitoring* for *Individual on Warfarin* (INR) measure beginning in 2020; however, due to the suspension of activities for the 2020 QRS, the 2021 ratings year will be the first year of data collection for the INR measure and the 2022 ratings year will be the first year for scoring the measure.

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<sup>&</sup>lt;sup>9</sup> These two measures will no longer be included in scoring.

<sup>&</sup>lt;sup>10</sup> CMS anticipates including this measure in scoring beginning with the 2021 ratings year.

<sup>&</sup>lt;sup>11</sup> See supra note 7.

- **Section 7. QRS Rating Methodology:** This section provides an overview of the rating methodology used to produce the QRS scores and ratings from QRS measure data.
- Section 8. Quality Rating Information and QHP Enrollee Survey Results and Preview: This section describes the process by which QHP issuers and Exchanges will be able to review QHP quality rating information (i.e., QRS ratings and QHP Enrollee Survey results) in advance of public display.
- Section 9. Exchanges Display Guidelines for QHP Quality Rating Information: This section provides an overview of the guidelines for display of QHP quality rating information on Exchange websites.

# **Key Differences in Display Guidelines Between the 2020 Guidance and the 2021 Guidance**

Beginning with the 2020 Plan Year (2019 ratings year), CMS displayed the QHP quality rating information for all Exchanges that used the HealthCare.gov platform, including the FFEs, inclusive of FFE states where the state performs plan management functions, and SBE-FPs. SBEs whose consumers do not use HealthCare.gov were required to display QHP quality ratings for the 2020 Plan Year, but had some flexibility to customize the display of the QHP quality rating information.

For the 2021 Plan Year (2020 ratings year), CMS will display the 2019 QHP quality rating information on HealthCare.gov for the FFEs and SBE-FPs. <sup>12</sup> SBEs whose consumers do not use HealthCare.gov have flexibility to continue to display 2019 QHP quality rating information on their respective websites or follow a state-specific approach for display of quality rating information for the 2021 Plan Year. <sup>13</sup>

CMS intends to release subsequent guidance regarding the display guidelines for the 2022 Plan Year (2021 ratings year). CMS will publish this guidance prior to the 2022 individual market open enrollment period (OEP).<sup>14</sup>

• Section 10. Marketing Guidelines for QHP Quality Rating Information: This section describes guidelines for QHP issuers that elect to include QHP quality rating information in their marketing materials.

<sup>&</sup>lt;sup>12</sup> See the August 11, 2020 *Quality Rating Information Bulletin*, available at: <a href="https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Downloads/Quality-Rating-Information-Bulletin-for-Plan-Year-2020.pdf">https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Downloads/Quality-Rating-Information-Bulletin-for-Plan-Year-2020.pdf</a>.

<sup>13</sup> *Id.* 

<sup>&</sup>lt;sup>14</sup> The 2022 OEP is from November 1, 2021 to December 15, 2021. See 45 C.F.R. § 155.410(e)(3).

# 2. Background

Section 1311(c)(3) of the Patient Protection and Affordable Care Act<sup>15</sup> directs the Secretary of HHS to develop a quality rating for each QHP offered through an Exchange, based on quality and price. Section 1311(c)(4) of the Patient Protection and Affordable Care Act directs the Secretary to establish an enrollee satisfaction survey that will assess enrollee satisfaction with each QHP offered through the Exchanges with more than 500 enrollees in the prior year.

Based on this authority, CMS finalized regulations in May 2014 to establish standards and requirements related to QHP issuer data collection and public reporting of quality rating information in every Exchange. <sup>16</sup> As a condition of certification and participation in the Exchanges, CMS requires that QHP issuers submit QRS clinical measure data and QHP Enrollee Survey response data for their respective QHPs offered through an Exchange in accordance with CMS guidelines. <sup>17</sup> Exchanges are also required to display QHP quality rating information on their respective websites. <sup>18</sup> Appendix A includes relevant statutory and regulatory citations for the QRS and QHP Enrollee Survey.

## Overview

The goals of the QRS and QHP Enrollee Survey are to:

- Provide comparable and useful information to consumers about the quality of health care services and enrollee experience with QHPs offered through the Exchanges,
- Facilitate oversight of QHP issuer compliance with quality reporting standards set forth in the Patient Protection and Affordable Care Act and implementing regulations, and
- Provide actionable information that QHP issuers can use to improve quality and performance.

CMS aligned federal quality reporting standards for QHP issuers with other federal and State quality reporting program standards, as well as with the Meaningful Measures Initiative, aimed at identifying the highest priority areas for quality measurement and quality improvement in order to assess core quality of care issues that are most vital to advancing the agency's work to improve patient outcomes. <sup>19</sup> States have the flexibility to build upon the federal quality reporting

<sup>&</sup>lt;sup>15</sup> The Patient Protection and Affordable Care Act (Pub. L. 111–148) as amended by the Health Care and Education Reconciliation Act of 2010 (Pub. L. 111–152) (collectively referred to as the Patient Protection and Affordable Care Act).

<sup>&</sup>lt;sup>16</sup> See 79 Fed. Reg. 30240 at 30352. Also see 45 C.F.R. §§ 155.1400, 155.1405, 156.1120 and 156.1125.

<sup>&</sup>lt;sup>17</sup> 45 C.F.R. §§ 156.200(b)(5), (h); 156.1120; and 156.1125.

<sup>&</sup>lt;sup>18</sup> 45 C.F.R. §§ 155.1400 and 155.1405.

<sup>&</sup>lt;sup>19</sup> The Meaningful Measures Initiative, launched in 2017, is CMS' most recent initiative that identifies the highest priorities for quality measurement and improvement. It involves assessing those core issues that are the most critical to providing high-quality care and improving individual outcomes. The initiative focuses on six quality priority areas: making care safer by reducing harm caused in the delivery of care, strengthening person and family engagement as partners in their care, promoting effective communication and coordination of care, promoting effective prevention and treatment of chronic disease, working with communities to promote best practices of healthy living, and making care affordable. For additional information, please visit <a href="https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/CMS-Quality-Strategy.html">https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/CMS-Quality-Strategy.html</a>.

standards for QHP issuers by setting additional standards that reflect State priorities and population-based needs.

QHP issuers that offered coverage through an Exchange in the prior year are required to submit third-party validated QRS clinical measure data and QHP Enrollee Survey response data to CMS as a condition of certification.<sup>20</sup>

CMS will calculate the quality performance ratings for QHPs offered through all Exchanges, regardless of the Exchange model. CMS will apply the QRS rating methodology to validated QRS clinical measure data and a subset of the QHP Enrollee Survey response data (QRS survey measures) to produce quality ratings on a 5-star rating scale. CMS will calculate quality ratings for each QHP issuer's product type (i.e., exclusive provider organization [EPO], health maintenance organization [HMO], point of service [POS], and preferred provider organization [PPO]) within each State and apply those ratings to each product type's eligible QHPs in that State.

CMS anticipates issuing guidance at least annually and expects to refine the QRS and QHP Enrollee Survey over time, based on experience with measuring and reporting quality performance for QHPs offered through the Exchanges. CMS proposes and communicates refinements to the QRS and QHP Enrollee Survey annually through a Call Letter process or through the information collection request process per the Paperwork Reduction Act requirements (as appropriate).

# 4. Implementation Schedule for the QRS and QHP Enrollee Survey

Exhibit 1 highlights key events and dates associated with 2021 QRS and QHP Enrollee Survey implementation. CMS expects QHP issuers to meet the following deadlines so data validators (Healthcare Effectiveness Data and Information Set [HEDIS®] Compliance Auditors) and survey vendors can effectively support QHP issuers in complying with the data collection and submission requirements. Details are addressed in the sections that follow.

Exhibit 1. Implementation Schedule for the 2021 QRS and QHP Enrollee Survey

Event	Date
QHP issuer contracts with a HEDIS® Compliance Organization (NCQA-licensed) for validation of the QHP Enrollee Survey sample frame and the QRS clinical measure data.	Deadline: October 1, 2020
QHP issuer contracts with an HHS-approved QHP Enrollee Survey vendor to conduct the QHP Enrollee Survey and submit survey response data to CMS.	Deadline: January 29, 2021
QHP issuer and HEDIS® Compliance Auditor (employee of or contracted by the HEDIS® Compliance Organization) complete validation of QHP Enrollee Survey sample frame.	Deadline: January 29, 2021

<sup>&</sup>lt;sup>20</sup> 45 C.F.R. §§ 156.200(b)(5), (h); 156.1120; and 156.1125.

<sup>&</sup>lt;sup>21</sup> The QHP Enrollee Survey includes a core question set that will be used to assess enrollee experience with health care services. Specific questions are grouped to form survey measures that will be used in the QRS.

Event	Date
QHP issuer submits template to report ineligibility, if applicable. QHP issuer completes and submits an ineligibility template to CMS via email if the QHP issuer determines that a reporting unit does not meet the January 1, 2021 enrollment threshold or any other eligibility requirement within 3 business days of discovery (but no later than the date specified in the 2021 QHP Enrollee Survey: Operational Instructions).  Note: The 2021 QHP Enrollee Survey: Operational Instructions are scheduled for distribution to QHP issuers in the fall of 2020 and will include detailed steps on how to complete and submit the ineligibility template.	Deadline: Mid-January 2021
QHP issuer completes NCQA's Healthcare Organization Questionnaire (HOQ) to authorize a QHP Enrollee Survey vendor and to prepare for QRS clinical measure data and QHP Enrollee Survey response data submission.	Deadline: February 2021
QHP issuer and HEDIS <sup>®</sup> Compliance Auditor complete the HEDIS <sup>®</sup> Compliance Audit <sup>™</sup> .	January – June 2021 <sup>22</sup>
HHS-approved QHP Enrollee Survey vendor conducts the QHP Enrollee Survey on the validated survey sample frame.	February – May 2021
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS (on behalf of the QHP issuer).	Deadline: May 24, 2021
QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA's Interactive Data Submission System (IDSS). <sup>23</sup> Note: Each QHP issuer must submit and plan-lock its QRS clinical measure data by June 3 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 15 deadline.	Deadline: June 15, 2021
QHP issuers, Exchange administrators, and CMS preview the 2021 QHP quality rating information.	August/September 2021
Anticipated public display QHP quality rating information.	<b>Deadline:</b> Start of individual market open enrollment period for 2022 <sup>24</sup>

# 5. Exchange Oversight Responsibilities

Exchanges are responsible for QHP certification and oversight of compliance with certification standards by QHP issuers operating in their respective Exchanges. Included in this responsibility is oversight of QHP issuer compliance with QRS and QHP Enrollee Survey requirements. <sup>25</sup> Thus, CMS (on behalf of the FFEs) and the SBEs and SBE-FPs will monitor and enforce compliance with QRS and QHP Enrollee Survey requirements with respect to QHP issuers operating in their respective Exchanges. CMS will coordinate with the SBEs as needed to support their oversight efforts since CMS is responsible for calculating quality ratings for all eligible QHPs in every Exchange. <sup>26</sup>

<sup>&</sup>lt;sup>22</sup> Please see the general guidelines in the 2021 Quality Rating System Measure Technical Specifications for a more detailed timeline for the HEDIS® Compliance Audit.

<sup>&</sup>lt;sup>23</sup> There are no fees for QHP issuers associated with accessing and using the IDSS.

<sup>&</sup>lt;sup>24</sup> See supra note 14.

<sup>&</sup>lt;sup>25</sup> 45 C.F.R. § 155.200(d).

<sup>&</sup>lt;sup>26</sup> 45 C.F.R. §§ 155.1010(a)(2) and 155.200(d). Also see 42 U.S.C. § 18031(c)(3).

CMS will provide the SBEs with: (1) a list of QHP issuers that have eligible reporting units (as defined in Section 6.1) and are required to submit QRS clinical measure and QHP Enrollee Survey response data, and (2) a status update following the data submission deadline with a list of QHP issuers that submitted data for their eligible reporting units. The SBEs can use this information to support oversight of their respective QHP issuers' compliance with QRS and QHP Enrollee Survey requirements.

In addition to the federal requirements established by HHS, an SBE may choose to impose additional quality reporting requirements for QHPs offered through its Exchange. The SBE can use additional State quality information to supplement the HHS-calculated QRS ratings. QHP issuers operating in an SBE should confirm any additional quality reporting requirements with that SBE.

# 6. QRS and QHP Enrollee Survey Requirements

This section outlines the participation criteria for compliance with QRS and QHP Enrollee Survey requirements (i.e., collection and submission of validated QRS clinical measure data and QHP Enrollee Survey response data to CMS). Also described in this section is the QRS measure set, which includes both clinical measures and survey measures derived from a subset of questions in the QHP Enrollee Survey. Lastly, this section details the requirements for data collection, data validation, and data submission for the QRS and the QHP Enrollee Survey.

Not all reporting units that are eligible for compliance with QRS and QHP Enrollee Survey requirements will be eligible for QRS scoring. Section 7 includes information regarding scoring of eligible reporting units.

# 6.1 Participation Criteria for QHP Issuers

QRS and QHP Enrollee Survey requirements apply to QHP issuers offering QHPs through the Exchanges that meet participation criteria defined in this section.

QHP issuers are required to collect and submit validated QRS clinical measure data and QHP Enrollee Survey response data for each unique combination of product type and State. <sup>27</sup> QHP issuers may not combine product types or States. Therefore, the reporting unit for the QRS and QHP Enrollee Survey is defined by the unique State-product type for each QHP issuer. Product types subject to the QRS and QHP Enrollee Survey requirements include EPO, HMO, POS, and PPO. At this time, QRS and QHP Enrollee Survey requirements do not apply to indemnity plans (i.e., fee for service plans), stand-alone dental plans or child-only plans. The QRS and QHP Enrollee Survey requirements also do not apply to basic health program (BHP) plans.

QHP issuers are required to collect and submit validated QRS clinical measure data and QHP Enrollee Survey response data for each reporting unit (defined above) that meets all of the below criteria:

<sup>&</sup>lt;sup>27</sup> Pursuant to 45 C.F.R. §§ 156.1120(a)(3) and 156.1125(b)(3), QHP issuers participating in the Exchanges must include information in their respective QRS and QHP Enrollee Survey data submissions only for those enrollees at the level specified by HHS.

- Offered<sup>28</sup> through an Exchange in the prior year (i.e., 2020 calendar year);
- Offered through an Exchange in the ratings year (i.e., 2021 calendar year) as the exact same product type; and
- Meets the ORS minimum enrollment requirements <sup>29, 30</sup>:
  - Included more than 500 enrollees as of July 1 in the prior year (i.e., July 1, 2020), and
  - Included more than 500 enrollees as of January 1 of the ratings year (i.e., January 1, 2021).

**Note:** In other words, QHP issuers are required to collect and submit validated clinical measure data and QHP Enrollee Survey enrollee response data for each *product type* offered through an Exchange for *two consecutive years* (i.e., 2020 and 2021) that had more than 500 enrollees as of July 1, 2020, and more than 500 enrollees as of January 1, 2021.

Reporting units discontinued before June 15 of the ratings year (i.e., June 15, 2021) are exempt from these requirements. For an eligible reporting unit impacted by a QHP issuer change in ownership (e.g., merger, acquisition) effective as of January 1 of the ratings year, the QHP issuer that assumes the reporting unit is responsible for meeting these requirements.

Please note, CMS will *not* accept voluntary data submissions for reporting units that do not meet participation criteria as defined above.

Exhibit 2 below visually represents the process for creating a reporting unit and determining QRS and QHP Enrollee Survey data submission eligibility.

The process includes the following steps: (1) combine same product types to create a reporting unit (as defined above); (2) determine whether the reporting unit operated on an Exchange in 2020; (3) determine whether the reporting unit will operate on an Exchange in 2021 as the same product type; (4) confirm the reporting unit will not discontinue before June 15, 2021; (5) determine whether the reporting unit met the first enrollment threshold (i.e., had more than 500 enrollees as of July 1, 2020); (6) determine whether the reporting unit met the second enrollment threshold (i.e., had more than 500 enrollees as of January 1, 2021); and (7) if the criteria in steps 1-6 are met, submit QRS clinical measure data and QHP Enrollee Survey response data.

If the criteria in Steps 1 through 6 are met, the QHP issuer must submit QRS clinical data and QHP Enrollee Survey data. For the purposes of determining eligibility, QHP issuers should review the following definitions:

 Operational: The QHPs in the reporting unit are available for purchase on an Exchange (Small Business Health Options Program [SHOP] or individual), accepting new members or groups, and/or have active or existing members.

<sup>&</sup>lt;sup>28</sup> For purposes of QRS participation, the term "offered" includes all reporting units that are operational through an Exchange (i.e., reporting units that are available for purchase through an Exchange [SHOP or individual market], accepting new members or groups, or have active or existing members) during the applicable year.

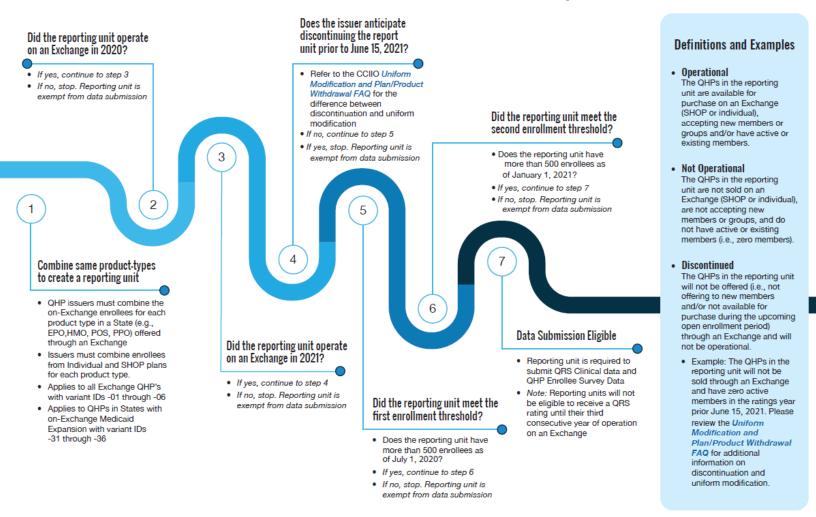
<sup>29</sup> 45 C.F.R. §§ 156.1120(a) and 156.1125(b).

<sup>&</sup>lt;sup>30</sup> The QHP Enrollee Survey minimum enrollment requirement aligns with standards set forth in 45 C.F.R. § 156.1125(b)(1). CMS established the minimum enrollment requirement for QRS to align with the QHP Enrollee Survey minimum enrollment requirement and to support a sufficient size for credible and reliable results.

- **Not Operational:** The QHPs in the reporting unit are not sold on an Exchange (SHOP or individual), are not accepting new members or groups, and do not have active or existing members (i.e., zero members).
- **Discontinued:** The QHPs in the reporting unit will not be offered (i.e., not being offered to new members and/or not available for purchase during the 2022 open enrollment period) through an Exchange and will not be operational. For example, the QHPs in the reporting unit will have zero active members in the ratings year prior to June 15, 2021 and will not be sold through an Exchange during the 2022 open enrollment period. Please refer to the <a href="Quality Rating FAQ">Quality Rating FAQ</a> for additional information regarding the difference between discontinuation and uniform modification.

#### Exhibit 2. QRS and QHP Enrollee Survey Data Submission Eligibility Roadmap

# QRS and QHP Enrollee Survey Data Submission Eligibility Roadmap



When determining which enrollees to include in each reporting unit, QHP issuers should follow the checklist provided as Exhibit 3.

Exhibit 3. QRS and QHP Enrollee Survey Enrollee Inclusions and Exclusions

Creating a Reporting Unit Applies to QHP Enrollee Survey and QRS Clinical Measures	√
Include the Following Enrollees:	
Enrollees in QHPs offered through an Exchange (HIOS variant IDs -01 through -06, <u>and</u> -31 through -36 for States with Medicaid 1115 waivers where the Medicaid expansion population is eligible to enroll in Exchange plans) in the prior year (i.e., 2020 calendar year).	
Enrollees in QHPs that provide family and/or adult medical coverage.	
Enrollees from both the individual market (individual and family plans [IFPs]) and SHOP if the QHP issuer offers the same product type in the individual market as well as the SHOP within a State (i.e., combine SHOP and IFPs if they are the same product type offered in the same State).  Example:	
<ul> <li>QHP issuer XYZ has 500 SHOP HMO enrollees in a particular State and 200 IFP HMO enrollees in the same state.</li> <li>QHP issuer XYZ pulls the reporting unit sample frame on January 6, 2021 containing 700 enrollees from SHOP and individual and family HMOs.</li> </ul>	
Combine enrollees from multiple products of the same product type in a single State into one reporting unit.  Example:	
<ul> <li>QHP issuer XYZ has three HMO plans in a particular State.</li> <li>QHP issuer XYZ combines enrollees from the three HMO plans for that State into a single reporting unit.</li> </ul>	
<b>Combine</b> enrollees from the same product type with multiple plan levels (e.g., bronze, expanded bronze, silver, gold, platinum, catastrophic) into one reporting unit. <i>Example:</i>	
<ul> <li>QHP issuer XYZ has silver and gold HMOs in a particular State.</li> <li>QHP issuer XYZ combines the silver and gold HMOs for that State into a single reporting unit.</li> </ul>	
Exclude the Following Enrollees:	
Enrollees in plans offered outside the Exchange (HIOS variant ID-00) and non-QHPs.	
Enrollees in indemnity (i.e., fee-for-service) plans, child-only health plans or stand-alone dental plans.	
Enrollees in a BHP plan.	
Confirm Minimum Enrollment Criteria:	
The QHPs in the reporting unit will operate on the Exchange as the exact same product type in both the 2020 and 2021 calendar years.	
There were more than 500 enrollees in the reporting unit as of July 1 in the prior year (i.e., July 2020).	
There were more than 500 enrollees in the reporting unit as of January 1 of the ratings year (i.e., January 2021).	
Enrollees in QHPs offered through an Exchange that may be aligned to a different issuer in the prior year in cases where the QHP issuer has documented a change in ownership that is effective as of January 1 of the ratings year (i.e., 2021 calendar year) should be included. In cases of such mergers or acquisitions, the gaining QHP issuer should include enrollees previously aligned to the ceding QHP issuer.	

# Example:

A fictional QHP issuer is certified to offer family medical coverage in two States: West Virginia (WV) and Maryland (MD). Exhibit 4 shows the characteristics of the issuer's reporting units. In

accordance with the participation criteria defined above, this QHP issuer must collect and submit validated QRS clinical measure data and QHP Enrollee Survey response data to CMS for only the following reporting units: 12345-WV-PPO, 12345-MD-EPO. The other reporting units either did not have a sufficient number of enrollees as of July 1, 2020; did not have a sufficient number of enrollees as of January 1, 2021; or were discontinued before June 15, 2021.

Exhibit 4. Example Reporting Units for a QHP Issuer Assessed Against 2021 QRS and QHP Enrollee Survey Participation Criteria

	•			
Reporting Unit	Enrollment as of July 1, 2020 (total and per individual market vs. SHOP	Enrollment as of January 1, 2021 (total and per individual market vs. SHOP)	Offered as of June 15, 2021	Meet participation criteria? (i.e., required to submit QRS and QHP Enrollee Survey measure data)?
12345-WV-PPO	505 (505 individual, 0 SHOP)	505 (505 individual, 0 SHOP)	Yes	Yes
12345-WV-HMO	601 (501 individual, 100 SHOP)	N/A	No – discontinued as of December 31, 2020	No – not operating in ratings year
12345-MD-PPO	100 (55 individual, 45 SHOP)	100 (55 individual, 45 SHOP)	Yes	No – insufficient enrollment size in both years
12345-MD-HMO	700 (700 individual, 0 SHOP)	300 (300 individual, 0 SHOP)	Yes	No – insufficient enrollment size as of January 1, 2021
12345-MD-EPO	505 (300 individual, 205 SHOP)	501 (300 individual, 201 SHOP)	Yes	Yes
12345-WV-EPO	500 (300 individual, 200 SHOP)	500 (300 individual, 200 SHOP)	Yes	No – insufficient enrollment size in both years

QHP issuers with specific questions related to the application of the QRS and QHP Enrollee Survey participation criteria and/or determining reporting unit eligibility should seek guidance from CMS via the Marketplace Service Desk (MSD). Details on addressing membership changes in measure data collection are provided in the "General Guidelines for Data Collection" section of the 2021 Quality Rating System Measure Technical Specifications under "Membership Changes."

# 6.2 QHP Enrollee Survey Sample Frame

This section provides detailed instructions for QHP issuers eligible to field the QHP Enrollee Survey on how to determine which enrollees to include in each reporting unit's sample frame. It also provides instructions for vendors on how to draw the QHP Enrollee Survey sample from each sample frame.

# 6.2.1 Create the Sample Frame (QHP Issuers)

QHP issuers must populate a complete, accurate, and valid sample frame of all survey-eligible enrollees for each reporting unit required to field the survey. The sample frame includes one

record or line for each survey eligible enrollee (i.e., one enrollee record per line). All sample frames must include current enrollees as of 11:59 p.m. on January 6, 2021 (the anchor date), Sample frames may not be pulled before this date. All sample frames must be pulled on or after January 7, 2021 and must include all enrollees as of the anchor date – NOT the date the sample frame was pulled. QHP issuers must draw all sample frames in a time frame that supports validation by a HEDIS® Compliance Auditor and submission to the vendor completed no later than January 29, 2021.

*Note:* Survey eligible enrollees must meet the criteria in Exhibit 5. However, eligibility determinations for reporting units to submit QRS clinical data and QHP Enrollee Survey response data are based on total enrollment (i.e., all enrollees in the reporting unit) and not the count of survey-eligible enrollees.

#### 6.2.1.1 Inclusion and Exclusion Criteria

Exhibit 5 provides an overview for QHP issuers to determine which enrollees to include in each reporting unit's sample frame. Enrollees are considered continuously enrolled if they are enrolled in the eligible QHP from July 1 through December 31, 2020 with no more than one 45-day break in enrollment. Enrollees are considered currently enrolled if they are enrolled in the eligible QHP at the end of the continuous enrollment period (i.e., December 31, 2020) and on January 6, 2021.

To ensure all enrollees meet the continuous and current enrollment criteria, QHP issuers may *not* generate sample frames until January 7, 2021. CMS will *not* accept submissions for reporting units that do not follow the specified guidelines for determining which enrollees should be included in the sample frame. QHP issuers must use a consistent approach when determining the eligible population and reporting for the QHP Enrollee Survey, the QRS clinical measures, and for each product offering.

**Note:** QHP issuers are required to provide a list of common plan name aliases to vendors prior to survey fielding to enable vendors to make accurate eligibility determinations for enrollee response data.

Exhibit 5. Enrollee Eligibility Requirements for the 2021 QHP Enrollee Survey (Survey Eligible Enrollees)

Eligibility Criteria	✓
Enrollee Eligibility Status: Eligible if all the listed criteria are met. Include in sample frame:	
Enrollee is in a QHP offered through the Exchange (HIOS variant IDs -01 through -06 or -31 through -36 for States with Medicaid 1115 waivers allowing access to Exchange plans).	
Enrollee is in a QHP offered through the Exchange that provides family and/or adult medical coverage.	
Enrollee is 18 years of age or older as of December 31, 2020.	
Enrollee meets continuous enrollment criteria.	
Enrollee is still enrolled on January 6, 2021 (i.e., meets current enrollment criteria).	
Enrollees who have requested to not be contacted (i.e., a "Do Not Survey" list).  NOTE: Vendors will exclude these enrollees from fielding using their internal do not call list; however, these enrollees remain eligible for sampling.	

Eligibility Criteria	✓
Enrollee Eligibility Status: Ineligible if any of the listed criteria apply. Exclude from the sample frame:	
Enrollee is in a QHP offered outside the Exchange (HIOS variant ID-00) or a non-QHP.	
Enrollee is in a QHP offered through the Exchange that is an indemnity (i.e., fee-for-service) plan, a child-only health plan or a stand-alone dental plan.	
Enrollee is in a BHP plan	
Enrollee is younger than 18 years of age as of December 31, 2020.	
Enrollee does not meet continuous enrollment criteria.	
Enrollee discontinued enrollment for the 2021 Plan Year prior to 11:59 p.m. on January 6, 2021.  NOTE: QHP issuers are not permitted to generate a separate list of disenrollees. All exclusions of disenrollees must occur prior to submitting the sample frame for the HEDIS® Compliance Audit.	
Enrollee is deceased as of January 6, 2021.	

#### 6.2.1.2 Sample Frame Data Format

The standardized sample frame layout is an ASCII fixed-width text file with defined fixed-column positions for each data element. Appendix H provides the data elements that should be included for each enrollee in the sample frame. Data elements must adhere to the value label characteristics described in Appendix H and are to be placed in the designated columns (i.e., specified field positions) without delimiters. Field contents must be left aligned, and data must start in the first position of each field. QHP issuers must fully populate all sample frame variables. When portions of required enrollee data are missing, QHP issuers must denote these data elements with the valid value for *Missing* provided in Appendix H. QHP issuers may not append any additional data fields to the sample frame that are not specified in the sample frame file layout.

# 6.2.2 Validate Sample Frame

CMS requires that QHP issuers use a HEDIS® Compliance Auditor (auditor) and follow the HEDIS® Compliance Audit standards to validate the QHP Enrollee Survey sample frame and the QRS clinical measure data. Each QHP issuer is responsible for selecting a HEDIS® Compliance Organization, determining fees, and entering into a data validation contract (if necessary). This process is designed to give QHP issuers the maximum opportunity to have valid and publicly reportable results. QHP issuers should refer to the following website to access the list of NCQA-certified HEDIS® Compliance Auditors:

https://www.ncqa.org/programs/data-and-information-technology/hit-and-data-certification/hedis-compliance-audit-certification/.

Exhibit 6 provides an overview of the sample frame validation process.

**Exhibit 6. Sample Frame Validation Process** 

Step	Description	✓
Step 1	In the NCQA HOQ, the QHP issuer enters information for each QHP Enrollee Survey reporting unit it is required to report. This is the number of sample frames the QHP issuer must produce.  Note: This is also the number of reporting units for which the QHP issuer must authorize an HHS-approved QHP Enrollee Survey vendor and verify required reporting unit information (e.g., enrollment, year plan began operating, three-year operational status) within the HOQ.	
Step 2	The QHP issuer generates the sample frame data file(s) per specifications.	
Step 3	The QHP issuer delivers the sample frame data file(s) to the NCQA HEDIS® Compliance Auditor (auditor).	
Step 4	The auditor validates the sample frame data file(s) and notifies the QHP issuer of the results. If the auditor determines the quality or completeness of the sample frame poses a threat to the desired survey response rate, the QHP issuer makes corrections to the sample frame until the desired audit result is achieved.	
Step 5	The auditor enters the result of the sample frame validation in the HOQ.	
Step 6	The QHP issuer forwards the sample frame data file(s) and documentation of the validation results to the QHP Enrollee Survey vendor.	
Step 7	The vendor draws the survey sample and administers the QHP Enrollee Survey per specifications.	

# 6.2.3 Provide Sample Frame to Vendor

Once a QHP issuer has received a validated sample frame from the auditor, the issuer must provide it directly to the issuer's contracted vendor in a secure manner. Vendors review the sample frame and assess the completeness of the contact information (e.g., mailing address, telephone number) included in the sample frame for each eligible enrollee. Vendors also conduct quality assurance (QA) checks of the sample frame to verify the accuracy of the information provided by the QHP issuer. Vendors must notify CMS (<a href="mailto:qhpsurveyvendor@bah.com">qhpsurveyvendor@bah.com</a>) of any QHP issuer clients that have not provided a validated sample frame by the deadline established by CMS (see Exhibit 1).

# 6.3 Reporting Ineligible Reporting Units

QHP issuers with ineligible reporting units must submit the reporting unit information to CMS. CMS will provide an ineligibility template and instructions in fall of 2020 on the MQI website. QHP issuers must include complete information for each reporting unit that does not meet eligibility criteria by selecting from a menu of ineligibility reasons.

#### 6.4 ORS Measure Set

QHP issuers that meet the participation criteria as defined in Section 6.1 are required to collect and submit validated data for all measures as listed in Exhibit 7. The QRS measure set consists of measures that address the areas of: Clinical Quality Management; Enrollee Experience; and Plan Efficiency, Affordability, & Management. The QRS measures align with the six quality priority areas that are focal to the Meaningful Measures Initiative: (1) making care safer by reducing harm caused in the delivery of care, (2) strengthening person and family engagement as partners in their care, (3) promoting effective communication and coordination of care, (4)

promoting effective prevention and treatment of chronic disease, (5) working with communities to promote best practices of healthy living, and (6) making care affordable.

Some measures have multiple indicators (or rates), including additional sub-levels (e.g., age bands). QHP issuers are required to submit validated data for all elements within a measure, unless a specific indicator is shown in parentheses next to the measure. In the latter case, only that indicator must be reported (e.g., for the *Childhood Immunization Status [Combination 3]* measure, only Combination 3 must be reported).

The survey measures in the QRS measure set will be collected as part of the QHP Enrollee Survey, which draws heavily from the Consumer Assessment of Healthcare Providers and Systems (CAHPS®)<sup>31</sup> surveys. Note that the QRS survey measures (except for the two clinical measures captured in the QHP Enrollee Survey) and the QRS clinical measure *Plan All-Cause Readmissions* are case-mix adjusted. See Section 6.5 for details on the QHP Enrollee Survey.

Exhibit 7. QRS Measure Set

Measure Title  * indicates measure currently not endorsed by NQF	National Quality Forum (NQF) ID <sup>32</sup>	QRS Measure Type
Access to Care	0006 <sup>33</sup>	Survey
Access to Information ¥	0007	Survey
Annual Dental Visit ¥	1388	Clinical
Annual Monitoring for Persons on Long-term Opioid Therapy	3541	Clinical
Antidepressant Medication Management	0105	Clinical
Appropriate Testing for Pharyngitis ¥	0002	Clinical
Appropriate Treatment for Upper Respiratory Infection	0069	Clinical
Asthma Medication Ratio	1800	Clinical
Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis	0058	Clinical
Breast Cancer Screening	2372	Clinical
Care Coordination	0006	Survey
Cervical Cancer Screening	0032	Clinical
Child and Adolescent Well-Care Visits <sup>34¥</sup>	N/A	Clinical

<sup>&</sup>lt;sup>31</sup> CAHPS<sup>®</sup> is a registered trademark of the Agency for Healthcare Research and Quality. The CAHPS<sup>®</sup> surveys are available at <a href="https://cahps.ahrq.gov">https://cahps.ahrq.gov</a>.

<sup>&</sup>lt;sup>32</sup> Definitions and endorsement status of NQF measures are available at <a href="http://www.qualityforum.org/Home.aspx">http://www.qualityforum.org/Home.aspx</a>.

<sup>&</sup>lt;sup>33</sup> The QRS *Access to Care* measure includes two separate NQF-endorsed measures, Getting Needed Care and Getting Care Quickly, along with an additional CAHPS® Health Plan Supplemental question regarding getting afterhours care.

<sup>&</sup>lt;sup>34</sup> For measurement year 2020, the measure steward (NCQA) updated the specifications for the QRS measure *Well-Child Visits in the Third, Fourth, Fifth and Sixth Years of Life* to add the rate for the *Adolescent Well-Care Visits* measure. The *Adolescent Well-Care Visits* was not previously included in the QRS measure set. As a result of the measure specification changes, NCQA modified the measure name of the *Well-Child Visits in the Third, Fourth, Fifth and Sixth Years of Life* to *Child and Adolescent Well-Care Visits*. CMS is assessing the impact of these specification changes and may propose to remove the *Child and Adolescent Well-Care Visits* measure from 2021 scoring in the 2021 Call Letter. The changes to the measure specifications do not change or otherwise impact the 2021 data submission requirements for the measure.

Measure Title  * indicates measure currently not endorsed by NQF	National Quality Forum (NQF) ID <sup>32</sup>	QRS Measure Type
Childhood Immunization Status (Combination 3)	0038	Clinical
Chlamydia Screening in Women	0033	Clinical
Colorectal Cancer Screening	0034	Clinical
Comprehensive Diabetes Care: Eye Exam (Retinal) Performed	0055	Clinical
Comprehensive Diabetes Care: Hemoglobin A1c (HbA1c) Control (<8.0%)	0575	Clinical
Comprehensive Diabetes Care: Medical Attention for Nephropathy	0062	Clinical
Controlling High Blood Pressure	0018	Clinical
Flu Vaccinations for Adults Ages 18-64	0039	Survey
Follow-Up After Hospitalization for Mental Illness (7-Day Follow-Up)	0576	Clinical
Immunizations for Adolescents (Combination 2)	1407	Clinical
Initiation and Engagement of Alcohol and Other Drug Dependence Treatment	0004	Clinical
International Normalized Ratio Monitoring for Individuals on Warfarin	0555	Clinical
Medical Assistance with Smoking and Tobacco Use Cessation	0027	Survey
Plan Administration	0006	Survey
Plan All-Cause Readmissions ¥	1768	Clinical
Prenatal and Postpartum Care ¥	1517	Clinical
Proportion of Days Covered	0541	Clinical
Rating of All Health Care	0006	Survey
Rating of Health Plan	0006	Survey
Rating of Personal Doctor	0006	Survey
Rating of Specialist	0006	Survey
Use of Imaging Studies for Low Back Pain ¥	0052	Clinical
Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents	0024	Clinical
Well-Child Visits in the First 30 Months of Life (6 or More Visits) <sup>35</sup>	1392	Clinical

Appendix B includes summaries of each QRS measure. For detailed measure specifications, QHP issuers should refer to each measure's technical specifications (in the 2021 Quality Rating System Measure Technical Specifications), which specify criteria for determining the eligible population.

<sup>&</sup>lt;sup>35</sup> For measurement year 2020, the measure steward (NCQA) updated the specifications for the QRS measure *Well-Child Visit in the First 15 Months of Life (6 or More Visits)* by adding a rate for children who turned 30 months old during the measurement year and had two or more well-child visits in the last 30 months. As a result of the specification change, NCQA updated the measure name to *Well-Child Visit in the First 30 Months of Life (6 or More Visits)*. The changes to the measure specifications do not change or otherwise impact the 2021 data submission requirements.

For additional information on how measures are used for scoring, please see Section 7.1.

# 6.5 QHP Enrollee Survey

The QHP Enrollee Survey is the survey used to measure the experience of the enrollee population in the Exchanges. While the survey utilizes questions from the CAHPS Health Plan Surveys, which are used widely to assess Medicare, Medicaid, and other commercial health plan performance, modifications and new questions were designed specifically for use with the Exchange enrollee population.

Consistent with other CAHPS instruments, the QHP Enrollee Survey uses a six-month reference period. The survey assesses enrollee experience with a QHP offered through an Exchange on the topics presented in Exhibit 8. Measures derived from a subset of survey questions are included in the QRS measure set and accompanying ratings. For a crosswalk that maps each QRS survey measure to the relevant QHP Enrollee Survey item(s), please see Appendix C.

QHP Enrollee Survey Topics
(Asterisk [\*] indicates survey questions within this topic are not included in QRS survey measures.)

Access to Care

Access to Information

Care Coordination

Cultural Competence \*

Doctor Communication \*

Enrollee Experience with Cost \*

Plan Administration

Prevention

**Exhibit 8. QHP Enrollee Survey Topics** 

## 6.6 Data Collection, Validation, and Submission

The following sections address the protocols for data collection, data validation, and data submission of the QRS clinical measure and QHP Enrollee Survey response data. Exhibit 9 illustrates the process and stakeholders with primary responsibility for the associated steps. The steps are detailed in subsequent sections.

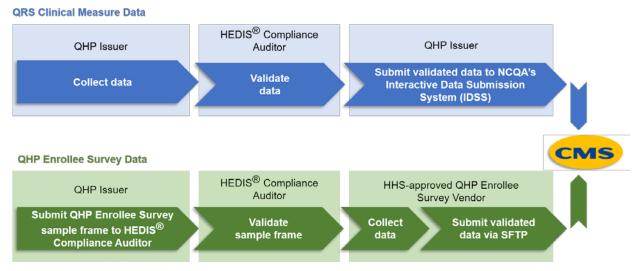


Exhibit 9. QRS Clinical Measure and QHP Enrollee Survey Response Data Process Flow

## 6.6.1 Data Collection

The next sections summarize details related to the data collection protocols for QRS clinical measure data and QHP Enrollee Survey response data. For additional data collection instructions for the QRS clinical measures, including the required data elements, refer to the 2021 Quality Rating System Measure Technical Specifications. For additional data collection procedures related to the QHP Enrollee Survey, refer to the Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021.

#### 6.6.1.1 QRS Clinical Measure Data Collection

QHP issuers will collect data for QRS clinical measures using administrative sources or a hybrid of administrative and medical record sources. The data collection methods are described below.

- **Administrative Method:** Uses data obtained from administrative sources (e.g., claims data) to identify the eligible population (denominator) and numerator compliance.
- **Hybrid Method:** Uses data obtained from both administrative and medical record/electronic medical record sources to identify the eligible population and numerator compliance. The denominator consists of a systematic sample of enrollees drawn from the measure's eligible population. QHP issuers then: a) review administrative data to determine numerator compliance, and b) review medical record data for enrollees who do not meet numerator criteria based on administrative data to identify additional numerator compliance for the measure.

QHP issuers must refer to the 2021 Quality Rating System Measure Technical Specifications to determine which data collection method is appropriate for each clinical measure. If more than one method is allowed, the QHP issuer may choose its preferred method.

#### 6.6.1.2 QHP Enrollee Survey Data Collection

Prior to survey administration, each QHP issuer will develop a sample frame of enrollees for each of its eligible reporting units (per criteria detailed in Section 6.1). QHP issuers must contract with an HHS-approved QHP Enrollee Survey vendor to administer the QHP Enrollee

Survey.<sup>36</sup> Vendors will sample eligible enrollees, using a standardized data collection protocol specified by CMS.<sup>37</sup> These vendors will collect enrollee responses to the survey questions on behalf of the OHP issuer.<sup>38</sup>

Issuers are required to authorize a survey vendor for eligible reporting units beginning in January 2021, via NCQA's HOQ. QHP issuers must confirm that all eligible reporting units are included in the HOQ and verify required reporting unit information (e.g., general information, enrollment year plan began operating, three-year operational status). For reporting units not eligible for the 2021 reporting year, QHP issuers will receive instructions via email to provide justification for non-reporting units.

A list of HHS-approved survey vendors is available on the MQI website; vendors are conditionally approved until the completion of training in the fall of each year. QHP issuers are not required to contract with the same vendor from the previous survey administration year, but may do so if the contracted vendor is on the list of approved vendors for the current survey administration year.

Each QHP issuer must formally authorize a vendor to collect and submit QHP Enrollee Survey response data to CMS on its behalf.<sup>39</sup> In fall of 2020, QHP issuers will receive instructions on the survey vendor authorization process.

#### 6.6.2 Data Validation

Each QHP issuer must have its clinical measure data and the QHP Enrollee Survey sample frame validated by a data validator, in accordance with the measure stewards' protocols, prior to data submission. <sup>40</sup> For 2021, CMS requires that QHP issuers use a HEDIS® Compliance Auditor and follow the HEDIS® Compliance Audit standards to validate all QRS measures, including the QHP Enrollee Survey sample frame. <sup>41</sup> The sections below contain details related to these data validation requirements.

#### 6.6.2.1 Data Validators

QHP issuers must use a HEDIS® Compliance Auditor (validator) to perform the HEDIS® Compliance Audit (i.e., validation of QRS measure data) for all clinical measures and the survey sample frame. Each QHP issuer is responsible for selecting the HEDIS® Compliance Organization, determining fees, and entering into a data validation contract (if necessary).

The HEDIS® Compliance Auditor should work with the QHP issuer throughout the data collection process, engaging in ongoing communications and a series of offsite and onsite reviews to confirm compliance with standards and protocols, including effective and sound data collection. This process is intended to be collaborative and iterative; it should occur continually

<sup>37</sup> 45 C.F.R. § 156.1105(b)(5).

<sup>&</sup>lt;sup>36</sup> 45 C.F.R. § 156.1125(a).

<sup>&</sup>lt;sup>38</sup> 45 C.F.R. §§ 156.1105 and 156.1125.

<sup>&</sup>lt;sup>39</sup> 45 C.F.R. § 156.1125(a).

<sup>&</sup>lt;sup>40</sup> 45 C.F.R. §§ 156.1120(a)(2) and 156.1125(b)(2).

<sup>&</sup>lt;sup>41</sup> The Pharmacy Quality Alliance (PQA) does not have a defined measure validation strategy for the *Proportion of Days Covered* measure. CMS requires this measure to be validated using the HEDIS® Compliance Audit standards, policies, and procedures.

until all data are submitted. The process is designed to give QHP issuers the maximum opportunity to have valid and publicly reportable results.

QHP issuers should refer to the following website to access the list of NCQA-certified HEDIS<sup>®</sup> Compliance Auditors: <a href="http://www.ncqa.org/HEDISQualityMeasurement/">http://www.ncqa.org/HEDISQualityMeasurement/</a> CertifiedSurveyVendorsAuditorsSoftwareVendors/HEDISComplianceAuditProgram.aspx.

#### 6.6.2.2 Data Validation Standards

The data validation standards are specified in the *HEDIS® Compliance Audit: Standards*, *Policies*, *and Procedures*. Auditors will use this uniform set of data validation standards to assess each QHP issuer's information system characteristics and capabilities, as well as its compliance with the *2021 Quality Rating System Measure Technical Specifications*. HEDIS® Compliance Auditors will also use the standards to assess the QHP issuer's sample frame for the QHP Enrollee Survey.

QHP issuers should refer to the *HEDIS*<sup>®</sup> *Compliance Audit: Standards, Policies, and Procedures*, which is available for purchase on the following website: <a href="http://store.ncqa.org/index.php/performance-measurement.html">http://store.ncqa.org/index.php/performance-measurement.html</a>.

#### 6.6.2.3 Data Validation Results

All QRS measures must have a final, validated result that indicates data are complete, accurate, and comparable. The HEDIS<sup>®</sup> Compliance Auditor will determine if the QHP issuer's clinical measure rates are reportable and if the QHP Enrollee Survey sample frame is accurate, using the HEDIS<sup>®</sup> Compliance Audit standards described above.

The HEDIS® Compliance Auditor will document one of the following results for each clinical measure once the QHP issuer submits its data:

- A rate: The QHP issuer followed the specifications and produced a reportable rate (numeric result) for the measure.
- **Benefit Not Offered (NB):** The QHP issuer did not offer the health benefit required by the measure.
- **Biased Rate (BR):** The QHP issuer's calculated rate was materially biased.
- **Not Reported (NR):** The OHP issuer chose not to report the measure.
- Not Applicable (NA): The QHP issuer followed the specifications, but the denominator was too small (i.e., less than 30 [or 150 for the PCR measure]) to report a valid rate. The QHP issuer did not have sufficient data to fulfill the continuous enrollment criteria for the measure. For example, a QHP issuer that has operated for only one year may be unable to meet the continuous enrollment criteria for the *Breast Cancer Screening* measure, which requires multi-year continuous enrollment as outlined in the 2021 Quality Rating System Measure Set Technical Specifications.

For QRS survey measures, the QHP issuer is responsible for sending the validated QHP Enrollee Survey sample frame and validator's approval notice to the survey vendor before the QHP Enrollee Survey is administered. Survey vendors are not permitted to proceed with fielding the survey until they receive the validator's approval notice.

## 6.6.2.3.1 Compliance Reviews

CMS may conduct targeted compliance reviews under 45 C.F.R. § 156.715 to examine compliance with the federal data submission and reporting requirements for the QRS and QHP Enrollee Survey (subsequent to data validation of QRS clinical measure and QHP Enrollee Survey response data) by QHP issuers participating in an FFE. These reviews could occur in cases where CMS suspects that a QHP issuer's mishandling of data, inappropriate processing, or implementation of incorrect practices has resulted in erroneous data, scores, or ratings. Examples include, but are not limited to: a QHP issuer's failure to adhere to QRS and QHP Enrollee Survey reporting requirements, and a QHP issuer's failure to pass data validation directly related to data reported for specific measures. Based on the findings of this compliance review or other evidence received by CMS, CMS may take enforcement action, such as the imposition of civil money penalties and/or decertification of the affected QHPs. 42

In addition, CMS may include compliance with the QRS and QHP Enrollee Survey data submission and reporting requirements as part of a more general compliance review of a QHP issuer participating in an FFE. CMS intends to coordinate with State regulators, when appropriate, to avoid duplication of efforts for these compliance reviews.

#### 6.6.3 Data Submission

Each QHP issuer will work with its HEDIS<sup>®</sup> Compliance Auditor and its HHS-approved QHP Enrollee Survey vendor to submit the required QRS clinical measure data and the QHP Enrollee Survey response data to CMS. Details related to the data submission process (based on data type) are provided below.

## 6.6.3.1 QRS Clinical Measure Data Submission

All QHP issuers submitting QRS clinical measure data must complete the Healthcare Organization Questionnaire (HOQ) to gain access to NCQA's web-based tool, the Interactive Data Submission System (IDSS). There are no fees for QHP issuers associated with accessing and using the IDSS. Upon completion of the HOQ, the IDSS will create a QRS-specific submission ID for the issuer.

NCQA will open the annual HOQ completion process in early January 2021 and close access in February 2021. When opened by NCQA, the HOQ can be accessed at: <a href="http://CustomerCenter.ncqa.org">http://CustomerCenter.ncqa.org</a>. For more information regarding the HOQ, visit: <a href="http://www.ncqa.org/tabid/219/Default.aspx">http://www.ncqa.org/tabid/219/Default.aspx</a>. QHP issuers should submit questions about the HOQ to the <a href="NCQA portal">NCQA portal</a>.

QHP issuers must submit only summary-level QRS clinical measure data (for each reporting unit) via NCQA's IDSS, once the data have been validated by a HEDIS<sup>®</sup> Compliance Auditor. Summary-level data are specific to each clinical measure and include such elements as eligible population or denominator, numerator, and the reported rate. Patient-level data are not required to be submitted via the IDSS for QRS clinical measures.

QHP issuers must work with their HEDIS® Compliance Auditors to submit the validated QRS clinical measure data and signed attestations (i.e., confirm data are accurate and reflect plan

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<sup>&</sup>lt;sup>42</sup> See, e.g., 45 C.F.R. § 156.800.

performance) by 11:59 p.m. Eastern Time (ET), June 15, 2021. QHP issuers should submit questions regarding the IDSS to the NCQA portal.

## 6.6.3.2 QHP Enrollee Survey Data Submission

On behalf of the QHP issuer, the HHS-approved QHP Enrollee Survey vendor will securely submit de-identified enrollee response data to CMS.

QHP Enrollee Survey vendors must submit the QHP Enrollee Survey response data by 11:59 p.m. ET, May 24, 2021.

#### **QRS Rating Methodology** 7.

This section describes how CMS will calculate 2021 QRS quality ratings based on the QRS clinical measure and QHP Enrollee Survey response data submitted in 2021.

CMS continuously refines the QRS program and QHP Enrollee Survey based on a variety of factors, including stakeholder feedback, clinical guideline changes, Agency priorities, and advances in quality measurement and survey administration that impact each year's ratings. Refinements should be considered when reviewing year over year comparisons.

Appendix D provides the 2021 QRS rating methodology.

# 7.1 Measures and Scoring

For 2021, QHP issuers are required to collect and submit validated data for 37 measures in the QRS measure set. Beginning in 2021, CMS removed the Adult BMI Assessment (ABA) and the Medication Management for People with Asthma (75% of Treatment Period) (MMA) measures from the QRS measure set. 43 Additionally, CMS incorporated the Asthma Medication Ratio (AMR) and Annual Monitoring for Persons on Long-term Opioid Therapy (AMO) measures into the QRS measure and will begin data collection in 2021.<sup>44</sup> CMS will not include these two measures in scoring until the 2022 ratings year, at the earliest. CMS previously finalized the addition of the International Normalized Ratio Monitoring for Individual on Warfarin (INR) measure beginning in 2020.<sup>45</sup> However, due to the suspension of data collection and reporting activities for the 2020 QRS, 46 the 2021 ratings year will be the first year of data collection for the INR measure and the 2022 ratings year will be the first year for scoring the measure. CMS therefore currently anticipates including 34 measures in scoring in 2021.<sup>47</sup>

<sup>&</sup>lt;sup>43</sup> See Section 3 of the Final 2020 QRS Call Letter, available at https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html. 44 Ibid.

<sup>&</sup>lt;sup>45</sup> See the Final 2019 Call Letter, available at: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-

Instruments/QualityInitiativesGenInfo/Downloads/2019 Call Letter for QRS and QHP Enrollee Experience Su rvey 508.pdf

<sup>&</sup>lt;sup>46</sup> See supra note 7.

<sup>&</sup>lt;sup>47</sup> As noted above, CMS is assessing the impact of the changes made by the measure steward (NCQA) to the specifications for the Well-Child Visits in the Third, Fourth, Fifth and Sixth Years of Life that was renamed the Child and Adolescent Well-Care Visits measure. As part of the 2021 Call Letter process, CMS may propose to remove the Child and Adolescent Well-Care Visits measures from 2021 scoring.

Exhibit 10 offers a comparative summary of the QRS measures and scoring approach for the 2020 and 2021 ratings years.

Exhibit 10.	QRS	Measures	and	Scoring <sup>48</sup>
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QRS Measures	2020 <sup>49</sup>	2021 (current year)
Number of measures required for QRS data submission	37	37*
Number of measures to be used for QRS scoring	36	34 <sup>50</sup>

<sup>\*</sup> QHP issuers should refer to each measure's technical specifications, which specify criteria for determining the eligible population and ability to submit data for the measure (e.g., a measure may require multiple years of continuous enrollment and, therefore, a new QHP issuer or reporting unit may be unable to report a numeric rate for this measure).

While QHP issuers are required to submit QRS measure data for eligible reporting units beginning with the reporting unit's second year of operation, eligible reporting units will not receive QRS scores and ratings until their *third* consecutive year of operation in the Exchange. Therefore, a reporting unit that is eligible to be scored must meet the criteria for data submission (as defined by Section 6.1) *and have been in operation for at least three consecutive years*. However, due to the suspension of 2020 QRS data collection, <sup>51</sup> reporting units in their second year of operation were unable to submit data for the first time during the 2020 QRS ratings year. Therefore, CMS is amending the scoring eligibility criteria such that the 2020 ratings year will not count toward scoring eligibility for 2021, since issuers were not required to submit data for the 2020 QRS. For example, as shown in Exhibit 11, to receive QRS scores and ratings in 2021, a reporting unit must be in operation in 2018, 2019, and 2021.

Exhibit 11. Reporting Unit Data Submission and Scoring Example

Criteria	Required to submit data?	Eligible to be scored?
Reporting unit operates in ratings year only (2021)	No, does not meet the QRS participation criteria	No
Reporting unit operates in ratings year and prior year (2021 and 2020) and meets the QRS participation criteria (as defined in Section 6.1)	Yes	No
Reporting unit began operating on the Exchange in 2019 (operational in 2019, 2020, and 2021) and meets the QRS participation criteria (as defined in Section 6.1)	Yes	No, operation in 2020 does not count toward scoring eligibility in 2021

<sup>&</sup>lt;sup>48</sup> In communicating total measure counts, the totals presented here represent the perspective of the measure steward, rather than the perspective of the QRS scoring methodology. If counting based on the perspective of the scoring methodology, there are 40 measures in total (rather than 37). The difference of three measures in this count comes from two factors. First, Prenatal and Postpartum Care (NQF #1517) is split into two distinct measures for the QRS hierarchy: *Timeliness of Prenatal Care* and *Postpartum Care*. Similarly, Proportion of Days Covered (NQF #0541) is split into three distinct measures: *Diabetes All Class, Renin Angiotensin System (RAS) Antagonists*, and *Statins*.

<sup>49</sup> The counts in this column reflect the applicable number of measures for the 2020 QRS had those activities not

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<sup>&</sup>lt;sup>49</sup> The counts in this column reflect the applicable number of measures for the 2020 QRS had those activities not been suspended in response to the COVID-19 public health emergency.

<sup>&</sup>lt;sup>50</sup> See supra note 46.

<sup>&</sup>lt;sup>51</sup> See supra note 7.

Criteria	Required to submit data?	Eligible to be scored?
Reporting unit operates for at least three consecutive years, beginning in 2018 or earlier (i.e., 2021, 2020, 2019, and 2018) and meets the QRS participation criteria (as defined in Section 6.1)	Yes	Yes

If a reporting unit is eligible for scoring, the data submitted for this reporting unit are included in ratings calculation. Specifically, the data are included with all other submitted data for reporting units eligible for scoring to create the national all-product reference group, and QRS scores and ratings are calculated for that reporting unit.

# 7.2 QRS Hierarchy

The QRS measures are organized into a hierarchical structure that serves as a foundation of the QRS rating methodology (Appendix D). The measures are grouped into hierarchy components (composites, domains, and summary indicators) to form a single global rating.

# 7.3 Overview of Process for Calculating QRS Scores and Ratings

Exhibit 12 is a visual overview of the QRS rating methodology, which shows how CMS calculates QRS scores and ratings from submitted QRS measure data.

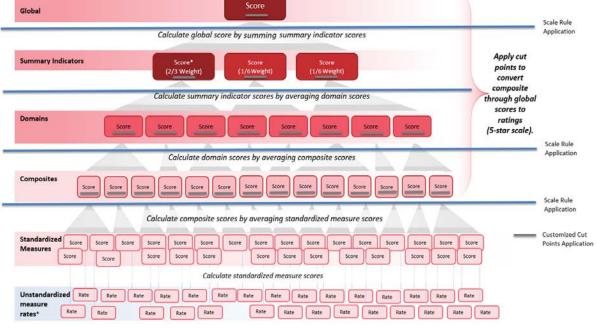


Exhibit 12. Overview of QRS Rating Methodology

This overview shows how CMS converts submitted measure data into higher-level QRS hierarchy component scores and ratings. The global score is the sum of weighted summary indicator scores (e.g., a weight of two-thirds [66.67%] to the Clinical Quality Management summary indicator, and a weight of one sixth [16.67%] to the Enrollee Experience and the Plan Efficiency, Affordability, & Management summary indicators).

<sup>\*</sup> Summary Indicator 1: Clinical Quality Management must have a valid score to calculate the global rating for a given reporting unit.

The other component scores are calculated by averaging scores of components in a lower level of the hierarchy. Thus, summary indicator scores will be averages of associated domain scores, and domain scores will be averages of associated composite scores.

Exhibit 13 further describes the process for calculating 2021 QRS scores and ratings. CMS conducts QA activities throughout the data scoring process, beginning upon receipt of QRS clinical measure data and QHP Enrollee Survey response data. These QA activities include verification of submitted data file attributes and data content quality checks to validate the accuracy, completeness, consistency, and validity of output files and reports.

Exhibit 13. Steps for Calculating QRS Scores and Ratings

Step	Sub-steps
Step 1. Calculate measure rates	<ul> <li>For QRS clinical measures with multiple measure indicators, calculate measure rates per the method defined by the measure's technical specifications.</li> <li>For QRS survey measures, calculate measure rates from QHP Enrollee Survey data.</li> </ul>
Step 2. Determine scoring status and application of denominator criteria	<ul> <li>Only reporting units that have operated for three consecutive years on the Exchange and meet the QRS enrollment criteria are ratings eligible. Reporting units that do not meet the ratings eligibility criteria are removed from the analytical data, and do not go through steps 3-10 below.</li> <li>The minimum denominator size is 30 observations for QRS clinical measures (including clinical measures captured in the QHP Enrollee Survey), 150 for the PCR measure, and 100 for QRS survey measures. Measures that do not meet the minimum denominator size requirement for scoring are excluded from QRS scoring.</li> </ul>
Step 3. Calculate standardized measure scores	• Independently transform all raw measure rates using z-standardization. Compare the measure rate values of each reporting unit to the mean measure rate using a national reference group (i.e., across all eligible reporting units), and control the spread using the standard deviation.
Step 4. Calculate composite scores	<ul> <li>Determine if the score can be calculated. Apply the half-scale rule, meaning the composite score can be calculated only if at least half (&gt;= 50%) of the associated measures have a score.</li> <li>Calculate the score. If half-scale rule is met, average standardized measure scores. Otherwise, no composite score is calculated.</li> </ul>
Step 5. Calculate domain scores	<ul> <li>Determine if the score can be calculated. Apply the half-scale rule, meaning the domain score can be calculated only if at least half (&gt;= 50%) of the associated composites have a score.</li> <li>Calculate the score. If the half-scale rule is met, average composite scores. Otherwise, no domain score is calculated.</li> </ul>
Step 6. Calculate summary indicator scores	<ul> <li>Determine if the score can be calculated. Apply the half-scale rule, meaning the summary indicator score can be calculated only if at least half (&gt;= 50%) of the associated domains have a score.</li> <li>Calculate the score. If the half-scale rule is met, average domain scores. Otherwise, no summary indicator score is calculated.</li> </ul>
Step 7. Apply explicit weights to summary indicator scores	Calculate the final score. Multiply the summary indicator scores calculated in Step 6 by the appropriate explicit weights (e.g., Clinical Quality Management score x 0.6667 = weighted Clinical Quality Management score).
Step 8. Calculate global score	<ul> <li>Determine if the score can be calculated. The global score can be calculated only if the Clinical Quality Management summary indicator received a score and at least one of the other two summary indicators received a score. Otherwise, no global score is calculated.</li> <li>Calculate the score. If the above scoring rule is met, sum the summary indicator scores (e.g., a weight of 2/3 (66.67%) to the Clinical Quality Management summary indicator, and a weight of 1/6 (16.67%) to the Enrollee Experience and the Plan Efficiency, Affordability, &amp; Management summary indicators).</li> </ul>

Step	Sub-steps
Step 9. Convert scores to ratings	<ul> <li>Identify cut point values. Identify cut point values for the global level using a clustering algorithm and a jackknife resampling approach. CMS uses submitted, scored, and aggregated QRS measure data to identify four cut point values (to delineate the 5-star rating categories). The data are jackknifed to create multiple sub-samples and the clustering process is run on each sub-sample. Then the average cut point is calculated across all sub-samples to identify each cut point value.</li> <li>Convert global scores to global ratings. Convert global score into a rating using the jackknifed cut points.</li> </ul>
Step 10. Produce QRS results for preview and finalization	<ul> <li>Prepare Ratings Output File (ROF).</li> <li>Prepare QRS preview reports and proof sheets for QRS preview period.</li> </ul>

# 8. Quality Rating Information and QHP Enrollee Survey Results and Preview

QHP issuers and State Exchange administrators will receive QHP quality rating information and QHP Enrollee Survey results and will be able to preview these results via the CMS Health Insurance Oversight System-Marketplace Quality Module (HIOS-MQM)<sup>53</sup> website during the annual preview period (anticipated August-September 2021). QHP issuers and State Exchange administrators will receive an email notification via the HIOS-MQM website prior to the start of preview.

# 8.1 QRS and QHP Enrollee Survey Preview via CMS' HIOS-MQM

During the QRS and QHP Enrollee Survey preview period, QHP issuers in all Exchanges will be able to preview their respective QRS and QHP Enrollee Survey results via CMS' HIOS-MQM website and submit any related inquiries to CMS. Exhibit 14 provides descriptions of the documents that will be available for preview on the HIOS-MQM website. The QRS Preview Reports, QRS Proof Sheets, QHP Enrollee Survey Quality Improvement (QI) reports, QHP Enrollee Survey QI Reports Methodology Guide, and National Quality Improvement Benchmark Report for the applicable ratings year will be available for preview on CMS' HIOS-MQM website concurrently.

<sup>&</sup>lt;sup>52</sup> The jackknife process provides more robust estimates, making the cut points less vulnerable to data changes.

<sup>&</sup>lt;sup>53</sup> Users must register for access to HIOS and the MQM via <a href="https://portal.cms.gov/">https://portal.cms.gov/</a>.

Exhibit 14. QRS and QHP Enrollee Survey Documents Available for Preview on the HIOS-MQM Website

Document Title	Description
QRS Preview Report	The QRS Preview Report provides the QRS ratings for each QHP issuer's eligible reporting unit(s). The ratings are provided on a 5-star scale for all QRS hierarchy components (i.e., composites, domains, summary indicators, and the global result).
	The QRS Preview Report will be available online and for download as a PDF file on CMS' HIOS-MQM website.
QRS Proof Sheet	The QRS Proof Sheet provides additional detail behind the ratings shown in the QRS Preview Report.
	The QRS Proof Sheet will be available for download on CMS' HIOS-MQM website as a PDF file and comma separated values (CSV) file.
	The PDF file displays outputs for each step of the QRS rating methodology, from the submitted raw measure values through the global score and rating. Specifically, the PDF file includes the following:
	<ul> <li>Scores and ratings for all QRS hierarchy components.</li> <li>Results for all QRS measures, including measures not included in scoring. For all measures, the file will include the raw rate and total denominator size.</li> <li>Cut points used to convert numeric scores to star ratings for each QRS hierarchy component.</li> </ul>
	<ul> <li>The CSV file provides additional information, specifically:</li> <li>Measure indicator values and sub-measure indicator values (age stratifications).</li> <li>Benchmark information (percentile values) for raw measure rates, allowing a QHP issuer to compare its reporting unit's results to all other reporting units nationally. CMS includes benchmark values that show the standardized 5th, 10th, 25th, 50th, 75th, 90th, and 95th percentile values of the numerical rates (raw values) across all eligible reporting units. To create these benchmark values, CMS uses only raw measure rates that have met the minimum denominator size criteria for scoring.</li> <li>Mean and standard deviation information for raw measure rates.</li> </ul>
QRS Proof Sheet User Guide	A PDF file that describes the contents of the QRS Proof Sheet and provides detail regarding the QRS rating methodology used to produce the QRS scores and ratings shown in the QRS Proof Sheet.
QHP Enrollee Survey Quality Improvement Reports (QI Reports)	These reports communicate the results of the full QHP Enrollee Survey, including questions not included as part of the QRS measure set. The raw frequencies for all QHP Enrollee Survey questions are included in the QHP Enrollee Survey QI Reports.
QHP Enrollee Survey QI Reports Methodology Guide	A PDF file that describes the contents of the QHP Enrollee Survey QI Reports. It includes details regarding the survey process and timeline and the methods for analyzing the survey data.
National Quality Improvement Benchmark Report	The National Quality Improvement Benchmark Report provides national-level statistics for the QHP Enrollee Survey scoring questions, screener questions, about-the-enrollee questions, and survey disposition. QHP issuers can use this report to compare the performance of their respective eligible reporting units to the performance of all reporting units that participated in the QHP Enrollee Survey for the given year.

# 8.1.1 Instructions for Accessing QRS and QHP Enrollee Survey Results

Access to the HIOS-MQM is required to view QRS and QHP Enrollee Survey results during the preview period. For QHP issuers seeking to access results for their reporting units during the preview period, please see the following instructions:

- 1) Log in to the HIOS-MQM website.
  - Users new to HIOS need to request access to HIOS and the MQM through the <u>CMS</u>
     <u>Enterprise Portal</u>. Existing HIOS users who are new to the MQM need to request a new role: Ratings/Reports Viewer. The Ratings/Reports Viewer role authorizes the user to

perform predetermined functions and access certain data sets. Detailed instructions for registering for access to HIOS and the MQM can be found in the *HIOS-MQM Quick Reference Guide*, located on the CMS MQI website.

2) Navigate to the Preview Ratings and Survey Results webpage and reports will populate for the user's corresponding QHPs. To access the QRS Preview Report, QRS Proof Sheet, and Quality Improvement (QI) Report, click the appropriate **Download** link at the bottom of the page.

Exchange administrators who need to access the results for all reporting units operating in their respective States can do so by following these instructions:

- 1) Log in to the HIOS-MQM website.
  - Users new to HIOS need to contact the appropriate authorizing official: CMS (via the Marketplace Service Desk [MSD]) or the cognizant State Access Administrator (SAA) to initiate a role request.
- 2) Navigate to the Preview Ratings and Survey Results webpage and reports will populate for the user's corresponding QHPs. To access the QRS Preview Report, QRS Proof Sheet, and QI Report click the appropriate **Download** link at the bottom of the page.
- 3) Navigate to the Download State Ratings and Survey Results webpage and download the State-level compiled QHP Enrollee Survey QI Report by selecting the **Download** link in the State Level QI Report column.
  - In September of the ratings year, download the machine readable, State-level compiled QRS quality ratings data file by selecting the **Download** link in the State Rating File column. Download the State Ratings Report by selecting the **Download** link in the State Rating Report column. (The State Ratings Report communicates the same information as the State Rating File in a user-friendly format.)

# 8.2 Additional Ratings Preview by SBEs

An SBE may choose to conduct an additional ratings preview period for QHP issuers operating in that Exchange. CMS encourages the SBEs to do so, particularly in States that require QHP issuers to report additional quality measures beyond the federal QRS and QHP Enrollee Survey requirements.

# 8.3 Preview Period Inquiries

CMS intends to work with QHP issuers and Exchange administrators to address any inquiries about the QRS results or QHP Enrollee Survey QI reports and to resolve potential discrepancies. All ratings submitted by CMS during the preview period are considered final ratings, unless otherwise noted after the preview period ends.

# 9. Display Guidelines for QHP Quality Rating Information

CMS is committed to increasing transparency and providing quality information to help empower consumers in making informed health care decisions. Public display of the 2021 QHP quality rating information by all Exchanges, including the FFEs, inclusive of FFE states where the state performs plan management functions, as well as SBE-FPs and SBEs is required during

the individual market open enrollment period and throughout the 2022 Plan Year.<sup>54</sup> In accordance with Section 1311(c)(3) and (c)(4) of the Patient Protection and Affordable Care Act and 45 C.F.R. §§ 155.1400 and 155.1405, all Exchanges are required to publicly report 2021 quality rating information on their websites to help consumers compare and shop for QHPs. CMS intends to release subsequent guidance regarding display of 2021 quality rating information beginning with the 2022 individual market open enrollment period. Subsequent guidance will specify the form and manner for display of the 2021 ratings, additional guidelines for direct enrollment entities and Exchanges, and what to display in cases where a QHP did not receive a rating. CMS will publish this guidance prior to the 2022 individual market open enrollment period.

# 9.1 Display on HealthCare.gov

CMS intends to release subsequent guidance specifying the form and manner in which CMS will display 2021 QHP quality rating information at HealthCare.gov. For example, on HealthCare.gov, CMS anticipates referring to the QRS global rating as the "Overall Quality Rating," the Clinical Quality Management summary indicator as "Medical Care," the "Enrollee Experience" summary indicator as "Member Experience," and the "Plan Efficiency, Affordability, & Management" summary indicator as "Plan Administration."

## 9.2 Display Guidance for SBEs

CMS intends to release subsequent guidance regarding display of 2021 QHP quality rating information for SBEs. SBEs that display the federally-calculated QHP quality ratings information, whether directly on the SBE website or a static website, must prominently display the following disclaimer language:

Plan quality ratings and enrollee survey results are calculated by the federal government, using data provided by health plans in 2021. The ratings will be displayed for health plans for the 2022 Plan Year. Learn more about these ratings. [Link to appropriate explanatory page on SBE's site.]

SBEs will continue to have some flexibility to customize the display of the QHP quality rating information on their respective websites.<sup>55</sup>

# 9.3 Display Guidance for Direct Enrollment Entities

CMS intends to release subsequent display guidance for QHP issuer and web-broker Direct Enrollment (DE) entities that facilitate enrollment through Exchanges. QHP issuer and web-broker DE entities that display 2021 QHP quality rating information on their websites beginning during 2022 open enrollment period should prominently display the following disclaimer language:

Plan quality ratings and enrollee survey results are calculated by the federal government, using data provided by health plans in 2021. The ratings will be

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<sup>&</sup>lt;sup>54</sup> See supra note 14.

<sup>&</sup>lt;sup>55</sup> See the HHS Notice of Benefit and Payment Parameters for 2021; Final Rule, 85 FR 29164 at 29214 – 29216 (May 14, 2020).

displayed for health plans for the 2022 Plan Year. Learn more about these ratings. [Link to appropriate explanatory/Help text on HealthCare.gov.]

# 10. Marketing Guidelines for QHP Quality Rating Information

QHP issuers may reference the 2021 QRS quality ratings and QHP Enrollee Survey results for their QHPs in marketing materials in a manner specified by CMS.<sup>56</sup> Any QHP issuer that elects to include its 2021 QHP quality rating information—specifically, its QRS scores and ratings and QHP Enrollee Survey results—in its marketing materials (whether paper, electronic, or other media) must do so in accordance with the CMS instructions below.<sup>57</sup>

The 2021 marketing guidelines are generally based on CMS guidance related to marketing QHPs as communicated in the annual *Letter to Issuers in the Federally-facilitated Exchanges*. <sup>58</sup> A QHP issuer that elects to include QRS and QHP Enrollee Survey information in its marketing materials must do so in a manner that does not mislead consumers. The instructions that follow detail the manner in which QRS and QHP Enrollee Survey information must be communicated in marketing materials:

- **Disclaimers:** QHP issuers must include the following disclaimers on marketing materials referencing QRS or QHP Enrollee Survey information. All disclaimers must be clear and conspicuous. Disclaimers are not required on call scripts, banners and banner-like ads, envelopes, outdoor advertising (e.g., billboards), text messages, and social media.
  - If marketing materials reference <u>only QRS information</u>, QHP issuers must include the following disclaimer on all materials:
    - CMS scores qualified health plans (QHPs) offered through the Exchanges using the Quality Rating System (QRS) based on third-party validated clinical measure data and QHP Enrollee Survey responses. CMS calculates ratings yearly on a 5-star scale. Ratings may change from year to year.
  - If marketing materials reference <u>only QHP Enrollee Survey information</u>, QHP issuers must include the following disclaimer on all materials:
    - O CMS evaluates qualified health plans (QHPs) offered through the Exchanges using QHP Enrollee Survey responses. QHP issuers work with HHS-approved survey vendors that independently conduct the survey each year. QHP Enrollee Survey results may change from year to year.
  - If marketing materials reference <u>QRS and QHP Enrollee Survey information</u>, QHP issuers must include the following disclaimer on all materials:

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<sup>&</sup>lt;sup>56</sup> 45 C.F.R. §§ 156.1120(c) and 156.1125(c).

<sup>&</sup>lt;sup>57</sup> The scope of the definition for "marketing" extends beyond the public's general concept of advertising materials. CMS interprets the definition of marketing materials, as referenced here, as equivalent to the definitions for the Medicare Advantage program in 42 C.F.R. § 422.2260.

<sup>&</sup>lt;sup>58</sup> See Chapter 5, Section 1 in the *Final 2021 Letter to Issuers in the Federally-facilitated Exchanges*, available at <a href="https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-2021-Letter-to-Issuers-in-the-Federally-facilitated-Marketplaces.pdf">https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-2021-Letter-to-Issuers-in-the-Federally-facilitated-Marketplaces, available at <a href="https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-2018-Letter-to-Issuers-in-the-Federally-facilitated-Marketplaces-and-February-17-Addendum.pdf">https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-2018-Letter-to-Issuers-in-the-Federally-facilitated-Marketplaces-and-February-17-Addendum.pdf</a>. See also 45 C.F.R. §§ 156. 225 (Marketing and Benefit Design of QHPs), 155.260 (Privacy and Security), and 156.200(e) (Non-discrimination).

- CMS scores qualified health plans (QHPs) offered through the Exchanges using the Quality Rating System (QRS) based on third-party validated clinical measure data and QHP Enrollee Survey responses. CMS calculates QRS ratings yearly on a 5-star scale. QHP issuers work with HHS-approved survey vendors that independently conduct the survey each year. QRS ratings and QHP Enrollee Survey results may change from year to year.
- Up-to-date information: QHP issuers that choose to include QHP quality rating information in marketing materials must use the most up-to-date information applicable to the plan year. QHP issuers must use the quality ratings applicable to the plan year, and QHP issuers must discontinue marketing based on the previous year's information. CMS anticipates issuing the final QRS ratings to QHP issuers and Exchange administrators annually, prior to the start of the individual market open enrollment period.
- **Specificity of content:** Materials should reference specific QHPs or product types and their CMS-assigned quality rating information. QHP issuers may advertise a product type's quality rating information (e.g., a "5-star HMO"), as QRS scores and ratings and QHP Enrollee Survey results are calculated for each product type (i.e., EPO, HMO, POS, PPO) and assigned to each QHP within the product type.
  - Materials should be specific as to the State to which the information applies.
  - QHP issuers with one or more QHPs (or product types) that were assigned a specific QRS global rating (e.g., 5-stars) should not create or disseminate marketing materials in a way that implies that all of their QHPs (or product types) achieved this rating.
  - QHP issuers are encouraged to advertise QRS ratings (i.e., stars) rather than scores (i.e., numerical value), which are less meaningful to consumers.
  - QHP issuers are encouraged to advertise the QRS global rating rather than the rating for other QRS components (i.e., summary indicators, domains, or composites).
    - o If QHP issuers choose to advertise ratings for QRS components, the QHP issuer may use only the component titles assigned by CMS without variation (e.g., Clinical Quality Management). If QHP issuers choose to advertise ratings for the three summary indicators, they must be labeled "Member Experience," "Medical Care," and "Plan Administration," consistent with HealthCare.gov consumer-facing language.
    - O QHP issuers required to adhere to requirements for providing information in languages other than English must use translated content consistent with HealthCare.gov. If QHP issuers choose to advertise ratings for any other QRS components, the QHP issuer may use only the component titles assigned by CMS without variation (like Patient Safety). Additionally, the QHP issuer must always include the QRS global rating alongside the QRS component rating.
  - The use of a general label in reference to the rating of a specific QHP (e.g., "a 5-star plan") can only be used to reference the QRS global rating, unless the component is specified (e.g., "a 5-star plan for [insert component name]"). QHP issuers may not use the rating for another QRS component (i.e., summary indicator, domain, composite, or measure) to imply a higher global rating than actually received. For example, a QHP

issuer may not promote a QHP that received a global rating of three stars and a summary indicator rating of five stars as a "5-star plan."

- QHP issuers may not use superlatives (e.g., "highest ranked," "one of the best") without additional context. For example, a QHP that received a 5-star rating for a specific QRS component, but received a 3-star global rating, may not be promoted as the highest ranked QHP in the State when other QHPs have a higher global rating.
- QHP issuers may not claim that any of their product types or QHPs are recommended or endorsed by the federal government, HHS, CMS, CCIIO, or the Exchanges. This includes, but is not limited to, use of the Department's name or logo; any HHS Agency's name and marks; or the Exchanges' names, logos, and marks in a manner that would convey the false impression that any product type is recommended or endorsed by the federal government, HHS or its Agencies, or the Exchanges.
- Compliance with State law and regulations: QHP issuers must comply with all applicable State laws and regulations on health plan marketing, and must not employ marketing practices that will have the effect of discouraging the enrollment of individuals with significant health needs in QHPs. <sup>59</sup>

Pursuant to 45 C.F.R. § 156.340(a)(1), a QHP issuer participating in an FFE or an SBE-FP maintains responsibility for its compliance and the compliance of any of its delegated or downstream entities, including affiliated agents and brokers, with the QRS and QHP Enrollee Survey marketing standards.<sup>60</sup>

States generally regulate health plan marketing practices and materials and related documents under State law, and CMS does not intend to review QHP marketing materials for compliance with State standards as described at 45 C.F.R. § 156.225(a).<sup>61</sup> In the FFE, CMS may review QHP marketing materials for compliance with applicable federal regulations.<sup>62</sup> CMS will work with States to determine where additional monitoring and review of marketing activities may be needed.

Complaints about a QHP issuer's marketing activities related to QHP quality rating information are generally overseen by the State. CMS will send such complaints to State regulators or federal entities, as appropriate, for investigation. Following investigation by the State or another federal agency investigation, CMS may take further enforcement action, if necessary or appropriate.

<sup>&</sup>lt;sup>59</sup> See 45 C.F.R. § 156.225.

<sup>&</sup>lt;sup>60</sup> This includes, but is not limited to, compliance by delegated and downstream entities with the marketing standards at 45 C.F.R. §§§ 156.225, 156.1120(c), and 156.1125(c).

<sup>&</sup>lt;sup>61</sup> See supra note 56.

<sup>&</sup>lt;sup>62</sup> See, for example, 45 C.F.R. §§§ 156.200(e), 156.225(b), 156.1120(c), and 156.1125(c).

# **Appendix A. Relevant Statutory and Regulatory Citations**

Exhibit 15 through Exhibit 18 include excerpts from the Patient Protection and Affordable Care Act and supporting regulations that are relevant to QRS and the QHP Enrollee Survey (referred to in the statute as the enrollee satisfaction survey system). The exhibits in this appendix are intended for reference only, and do not comprise an exhaustive list of QHP issuer and/or Exchange requirements.

Exhibit 15. Patient Protection and Affordable Care Act, 42 U.S.C. Sec. 18031 (March 23, 2010)

Topic	Provisions	Citation
QHP certification standards: Public reporting of quality information	(c) RESPONSIBILITIES OF THE SECRETARY.—  (1) IN GENERAL.—The Secretary shall, by regulation, establish criteria for the certification of health plans as qualified health plans. Such criteria shall require that, to be certified, a plan shall, at a minimum—  (H) provide information to enrollees and prospective enrollees, and to each Exchange in which the plan is offered, on any quality measures for health plan performance endorsed under section 399JJ of the Public Health Service Act, as applicable.  (I) report to the Secretary at least annually and in such manner as the Secretary shall require, pediatric quality reporting measures consistent with the pediatric quality reporting measures established under section 1139A of the Social Security Act. [As added by section 10203(a)]"	Section 1311 (c)(1)(H),(I)
Exchange standards: Public reporting of QRS and QHP Enrollee Survey information	(3) RATING SYSTEM.—The Secretary shall develop a rating system that would rate qualified health plans offered through an Exchange in each benefits level on the basis of the relative quality and price. The Exchange shall include the quality rating in the information provided to individuals and employers through the Internet portal established under paragraph (4).	Section 1311 (c)(3)
	(4) ENROLLEE SATISFACTION SYSTEM.—The Secretary shall develop an enrollee satisfaction survey system that would evaluate the level of enrollee satisfaction with qualified health plans offered through an Exchange, for each such qualified health plan that had more than 500 enrollees in the previous year. The Exchange shall include enrollee satisfaction information in the information provided to individuals and employers through the Internet portal established under paragraph (5) in a manner that allows individuals to easily compare enrollee satisfaction levels between comparable plans.	Section 1311 (c)(4)
	(5) INTERNET PORTALS.—The Secretary shall —  (B) make available for use by Exchanges a model template for an Internet portal that may be used to direct qualified individuals and qualified employers to qualified health plans, to assist such individuals and employers in determining whether they are eligible to participate in an Exchange or eligible for a premium tax credit or cost sharing reduction, and to present standardized information (including quality ratings) regarding qualified health plans offered through an Exchange to assist consumers in making easy health insurance choices. Such template shall include, with respect to each qualified health plan offered through the Exchange in each rating area, access to the uniform outline of coverage the plan is required to provide under section 2716 of the Public Health Service Act and to a copy of the plan's written policy.	Section 1311 (c)(5)(B)
	(d) REQUIREMENTS.—  (4) FUNCTIONS.—An Exchange shall, at a minimum —  (D) assign a rating to each qualified health plan offered through such Exchange in accordance with the criteria developed by the Secretary under subsection (c)(3);  (E) utilize a standardized format for presenting health benefits plan options in the Exchange, including the use of the uniform outline of coverage established under section 2715 of the Public Health Service Act;	Section 1311 (d)(4)(D),(E)

Exhibit 16. Patient Protection and Affordable Care Act; Establishment of Exchanges and Qualified Health Plans; Exchange Standards for Employers, Final Rule, 77 Fed. Reg. 18310-18475 (March 27, 2012)

Topic	Provisions	Citation
Exchange standards for quality activities	(d) Quality activities. The Exchange must evaluate quality improvement strategies and oversee implementation of enrollee satisfaction surveys, assessment and ratings of health care quality and outcomes, information disclosures, and data reporting in accordance with sections 1311(c)(1), 1311(c)(3), and 1311(c)(4) of the Patient Protection and Affordable Care Act.	45 C.F.R. § 155.200(d) Functions of an Exchange
Exchange standards for public display of QHP quality rating information	<ul> <li>(b) Internet Web site. The Exchange must maintain an up-to-date Internet Web site that meets the requirements outlined in paragraph (c) of this section and:</li> <li>(1) Provides standardized comparative information on each available QHP, including at a minimum:</li> </ul>	45 C.F.R. § 155.205(b)(1)(iv),(v) Consumer assistance tools and programs of an Exchange
	(iv) The results of the enrollee satisfaction survey, as described in section 1311(c)(4) of the Patient Protection and Affordable Care Act;	
	(v) Quality ratings assigned in accordance with section 1311(c)(3) of the Patient Protection and Affordable Care Act.	

Exhibit 17. Patient Protection and Affordable Care Act; Program Integrity: Exchange, Premium Stabilization Programs, and Market Standards; Amendments to the HHS Notice of Benefit and Payment Parameters for 2014; Final Rule, 78 Fed. Reg. 65046-65105 (October 30, 2013)

Topic	Provisions	Citation
Application & standards for QHP Enrollee Survey vendors; List of HHS-approved vendors	<ul> <li>(a) Application for approval. An enrollee satisfaction survey vendor must be approved by HHS, in a form and manner to be determined by HHS, to administer, on behalf of a QHP issuer, enrollee satisfaction surveys to QHP enrollees. HHS will approve enrollee satisfaction survey vendors on an annual basis, and each enrollee satisfaction survey vendor must submit an application for each year that approval is sought.</li> <li>(b) Standards. To be approved by HHS, an enrollee satisfaction survey vendor must meet each of the following standards:</li> </ul>	45 C.F.R. § 156.1105(a)-(c) Establishment of standards for HHS- approved enrollee satisfaction survey vendors for use by QHP issuers in Exchanges
	<ul> <li>(1) Sign and submit an application form for approval in accordance with paragraph (a) of this section;</li> <li>(2) Ensure, on an annual basis, that appropriate staff participate in enrollee satisfaction survey vendor training and successfully complete a post-training certification exercise as established by HHS;</li> <li>(3) Ensure the accuracy of their data collection, calculation and submission processes and attest to HHS the veracity of the data and these processes:</li> </ul>	
	<ul> <li>(4) Sign and execute a standard HHS data use agreement, in a form and manner to be determined by HHS, that establishes protocols related to the disclosure, use and reuse of HHS data;</li> <li>(5) Adhere to the enrollee satisfaction survey protocols and technical specifications in a manner and form required by HHS;</li> <li>(6) Develop and submit to HHS a quality assurance plan and any supporting documentation as determined to be relevant by HHS. The plan must describe in adequate detail the implementation of and compliance with all required protocols and technical specifications described in paragraph (b)(5) of this section;</li> </ul>	

Topic	Provisions	Citation
	(7) Adhere to privacy and security standards established and implemented under § 155.260 of this subchapter by the Exchange with which they are associated;	
	(8) Comply with all applicable state and federal laws;	
	(9) Become a registered user of the enrollee satisfaction survey data warehouse to submit files to HHS on behalf of its authorized QHP contracts;	
	(10) Participate in and cooperate with HHS oversight for quality-related activities, including, but not limited to: review of the enrollee satisfaction survey vendor's quality assurance plan and other supporting documentation; analysis of the vendor's submitted data and sampling procedures; and site visits and conference calls; and,	
	(11) Comply with minimum business criteria as established by HHS.	
	(c) Approved list. A list of approved enrollee satisfaction survey vendors will be published on an HHS Web site.	

Exhibit 18. Patient Protection and Affordable Care Act; Exchange and Insurance Market Standards for 2015 and Beyond, Final Rule, 79 Fed. Reg. 30240-30353 (May 27, 2014)

Topic	Provisions	Citation
Exchange standards for public display of QRS ratings <sup>63</sup>	The Exchange must prominently display the quality rating information assigned to each QHP on its Web site, in accordance with § 155.205(b)(1)(v), as calculated by HHS and in a form and manner specified by HHS.	45 C.F.R. § 155.1400 Quality rating system
Exchange standards for public display of QHP Enrollee Survey information <sup>64</sup>	The Exchange must prominently display results from the Enrollee Satisfaction Survey for each QHP on its Web site, in accordance with § 155.205(b)(1)(iv), as calculated by HHS and in a form and manner specified by HHS.	45 C.F.R. § 155.1405 Enrollee satisfaction survey system
QHP certification standards: public reporting of QHP quality rating information <sup>65</sup>	<ul> <li>(a) General requirement. In order to participate in an Exchange, a health insurance issuer must have in effect a certification issued or recognized by the Exchange to demonstrate that each health plan it offers in the Exchange is a QHP.</li> <li>(b) QHP issuer requirement. A QHP issuer must—</li> <li>(5) Implement and report on a quality improvement strategy or strategies described in section 1311(c)(1)(E) of the Patient Protection and Affordable Care Act consistent with the standards of section 1311(g) of the Patient Protection and Affordable Care Act, disclose and report information on health care quality and outcomes described in sections 1311(c)(1)(H), (c)(1)(I), and (c)(3) of the Patient Protection and Affordable Care Act, and implement appropriate enrollee satisfaction surveys consistent with section 1311(c)(4) of the Patient Protection and Affordable Care Act;</li> <li>(h) As a condition of certification of a QHP, an issuer must attest that it will comply with all QHP operational requirements described in subparts D, E, H, K, L, and M of this part.</li> </ul>	45 C.F.R. § 156.200(a),(b)(5),(h) QHP issuer participation standards

<sup>&</sup>lt;sup>63</sup> See Exhibit 19 for details on amendments to this regulation to capture flexibility for certain States Exchanges to customize the display of quality rating information on their websites within certain parameters.
<sup>64</sup> Ibid

<sup>&</sup>lt;sup>65</sup> The QHP participation standards at 45 C.F.R. § 156.200 were first codified as part of the "Establishment of Exchange and QHP Standards; Exchange Standards for Employers" Final Rule (March 27, 2012). This citation is

Topic	Provisions	Citation
Monitoring of QHP Enrollee Survey vendors and vendor appeals	(d) Monitoring. HHS will periodically monitor HHS-approved enrollee satisfaction survey vendors to ensure ongoing compliance with the standards in paragraph (b) of this section. If HHS determines that an HHS-approved enrollee satisfaction survey vendor is non-compliant with the standards required in paragraph (b) of this section, the survey vendor may be removed from the approved list described in paragraph (c) of this section and/or the submitted survey results may be ineligible to be included for ESS results.  (e) Appeals. An enrollee satisfaction survey vendor that is not approved by HHS after submitting the application described in paragraph (a) of this section may appeal HHS's decision by notifying HHS in writing within 15 days from receipt of the notification of not being approved and submitting additional documentation demonstrating how the vendor meets the standards in paragraph (b) of this section. HHS will review the submitted documentation and make a final approval determination within 30 days from receipt of the additional documentation.	45 C.F.R. § 156.1105(d),(e) Establishment of standards for HHS- approved enrollee satisfaction survey vendors for use by QHP issuers in Exchanges
Standards for QRS data submission, data validation, implementation timeline, and marketing of QRS ratings; Multi-State Plan requirements	<ul> <li>(a) Data submission requirement.</li> <li>(1) A QHP issuer must submit data to HHS and Exchanges to support the calculation of quality ratings for each QHP that has been offered in an Exchange for at least one year.</li> <li>(2) In order to ensure the integrity of the data required to calculate the QRS, a QHP issuer must submit data that has been validated in a form and manner specified by HHS.</li> <li>(3) A QHP issuer must include in its data submission information only for those QHP enrollees at the level specified by HHS.</li> <li>(b) Timeline. A QHP issuer must annually submit data necessary to calculate the QHP's quality ratings to HHS and Exchanges, on a timeline and in a standardized form and manner specified by HHS.</li> <li>(c) Marketing requirement. A QHP issuer may reference the quality ratings for its QHPs in its marketing materials, in a manner specified by HHS.</li> <li>(d) Multi-State plans. Issuers of multi-State plans, as defined in § 155.1000(a) of this subchapter, must provide the data described in paragraph (a) of this section to the U.S. Office of Personnel Management, in the time and manner specified by the U.S. Office of Personnel Management.</li> </ul>	45 C.F.R. § 156.1120 (a)–(d) Quality rating system

included here because of the technical amendments that were made as part of the "Exchange and Insurance Market Standards for the 2015 and Beyond" Final Rule (May 27, 2014) to cross-reference the QRS statutory provisions and correctly align it with the other quality standards originally listed in the regulation as part of the QHP certification standards.

Topic	Provisions	Citation
Standards for administering the QHP Enrollee Survey and marketing survey results; Multi-State	(a) General requirement. A QHP issuer must contract with an HHS-approved enrollee satisfaction survey (ESS) vendor, as identified by § 156.1105, in order to administer the Enrollee Satisfaction Survey of the QHP's enrollees. A QHP issuer must authorize its contracted ESS vendor to report survey results to HHS and the Exchange on the issuer's behalf.	45 C.F.R. § 156.1125 (a)–(e) Enrollee satisfaction survey system
Plan requirements	(b) Data requirement. (1) A QHP issuer must collect data for each QHP, with more than 500 enrollees in the previous year that has been offered in an Exchange for at least one year and following a survey sampling methodology provided by HHS.	
	(2) In order to ensure the integrity of the data required to conduct the survey, a QHP issuer must submit data that has been validated in a form and manner specified by HHS, and submit this data to its contracted ESS vendor.	
	(3) A QHP issuer must include in its data submission information only for those QHP enrollees at the level specified by HHS.	
	(c) Marketing requirement. A QHP issuer may reference the survey results for its QHPs in its marketing materials, in a manner specified by HHS.	
	(d) <i>Timeline</i> . A QHP issuer must annually submit data necessary to conduct the survey to its contracted ESS vendor on a timeline and in a standardized form and manner specified by HHS.	
	(e) Multi-State plans. Issuers of multi-State plans, as defined in § 155.1000(a) of this subchapter, must provide the data described in paragraph (b) of this section to the U.S. Office of Personnel Management, in the time and manner specified by the U.S. Office of Personnel Management.	

Exhibit 19. Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters for 2021; Notice Requirement for Non-Federal Governmental Plans (May 14, 2020)<sup>66</sup>

Topic	Provisions	Citation		
Exchange standards for public display of QRS ratings	The Exchange must prominently display the quality rating information assigned to each QHP on its Web site, in accordance with § 155.205(b)(1)(v), in a form and manner specified by HHS.	45 C.F.R. § 155.1400 Quality rating system		
Exchange standards for public display of QHP Enrollee Survey information	The Exchange must prominently display results from the Enrollee Satisfaction Survey for each QHP on its Web site, in accordance with § 155.205(b)(1)(iv), in a form and manner specified by HHS.	45 C.F.R. § 155.1405 Enrollee satisfaction survey system		

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<sup>&</sup>lt;sup>66</sup> This rulemaking amended §§ 155.1400 and 155.1405 to codify the flexibility for State Exchanges that operate their own eligibility and enrollment platforms to customize the display of quality rating information on their websites to display the quality rating information as calculated by HHS or to display quality rating information based upon certain state-specific customizations of the quality rating information provided by HHS.

# **Appendix B. QRS Measure Summaries**

Exhibit 20 includes measure summaries for the final 2021 QRS measure set, organized alphabetically. Measures denoted with an asterisk (\*) use a look-back period (i.e., contain multiple years of data).

For detailed QRS clinical measure specifications, refer to the 2021 Quality Rating System Measure Technical Specifications at: <a href="http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html">http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html</a>. For a crosswalk that maps each QRS survey measure to the relevant QHP Enrollee Survey item(s), please see Appendix C.

#### Exhibit 20, ORS Measure Summaries

Measure Name:	Access to Care
Measure Steward:	Agency for Healthcare Research and Quality (AHRQ)
NQF Endorsement ID:	0006 <sup>67</sup>
Description:	<ul> <li>Enrollee experience related to the following:</li> <li>Got care for illness/injury as soon as needed</li> <li>Got non-urgent appointment as soon as needed</li> <li>How often it was easy to get necessary care, tests, or treatment</li> <li>Got appointment with specialists as soon as needed</li> </ul>
Data Source(s):	QHP Enrollee Survey

Measure	Name:	Access	to In	formation
wicasui c	Haille.	AUUUUU	to III	IOIIIIALIOII

Measure Steward: AHRQ

NQF Endorsement ID: 0007 (Not endorsed)

Description: Enrollee experience related to the following:

Written materials or Internet provided information needed about how plan works
Found out from health plan about cost for health care service or equipment

• Found out from health plan about cost for specific prescriptions

Data Source(s): QHP Enrollee Survey

<sup>&</sup>lt;sup>67</sup> The QRS *Access to Care* measure includes two separate NQF-endorsed measures (Getting Needed Care and Getting Care Quickly), along with an additional CAHPS<sup>®</sup> Health Plan Supplemental question regarding getting after-hours care.

Measure Name: Annual Dental Visit<sup>68</sup>

Measure Steward: NCQA

NQF Endorsement ID: 1388 (Not Endorsed)

Description: The percentage of members 2-20 years of age who had at least one dental visit

during the measurement year.

Data Source(s): Administrative Data

Measure Name: Annual Monitoring for Persons on Long-term Opioid Therapy

Measure Steward: PQA

NQF Endorsement ID: 3541

Description: The percentage of individuals 18 years and older who are prescribed long-term opioid

therapy and have not received a drug test at least once during the measurement

year.

Data Source(s): Administrative Data

Measure Name: Antidepressant Medication Management\*

Measure Steward: NCQA
NQF Endorsement ID: 0105

Description: The percentage of members 18 years of age and older who were treated with

antidepressant medication, had a diagnosis of major depression and who remained on an antidepressant medication treatment. Two rates are reported. Two rates are

reported:

1. Effective Acute Phase Treatment. The percentage of members who remained on

an antidepressant medication for at least 84 days (12 weeks)

Effective Continuation Phase Treatment. The percentage of members who remained on an antidepressant medication for at least 180 days (6 months)

Data Source(s): Administrative Data

Measure Name: Appropriate Testing for Pharyngitis\*

Measure Steward: NCQA

NQF Endorsement ID: 0002 (Not Endorsed)

Description: The percentage of episodes for members 3 years and older where the member was

diagnosed with pharyngitis, dispensed an antibiotic and received a group A

streptococcus (strep) test for the episode.

<sup>&</sup>lt;sup>68</sup> QHP issuers should not include data from stand-alone dental plans in their QRS clinical data submission.

Measure Name: Appropriate Treatment for Upper Respiratory Infection\*

Measure Steward: NCQA

NQF Endorsement ID: 0069

Description: The percentage of episodes for members 3 months of age and older with a diagnosis

of upper respiratory infection (URI) that did not result in an antibiotic dispensing

event.

Data Source(s): Administrative Data

Measure Name: Asthma Medication Ratio

Measure Steward: NCQA

NQF Endorsement ID: 1800

Description: The percentage of patients 5–64 years of age who were identified as having

persistent asthma and had a ratio of controller medications to total asthma

medications of 0.50 or greater during the measurement year.

Data Source(s): Administrative Data

Measure Name: Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis\*

Measure Steward: NCQA

NQF Endorsement ID: 0058

Description: The percentage of episodes for members ages 3 months and older with a diagnosis

of acute bronchitis/ bronchiolitis that did not result in an antibiotic dispensing event.

Data Source(s): Administrative Data

Measure Name: Breast Cancer Screening\*

Measure Steward: NCQA
NQF Endorsement ID: 2372

Description: The percentage of women 50-74 years of age who had a mammogram to screen for

breast cancer.

Measure Name: Care Coordination

Measure Steward: AHRQ NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

• Doctor seemed informed and up-to-date about care from other health providers

· Doctor had your medical records

• Doctor followed up about blood test, x-ray results

Got blood test, x-ray results as soon as you needed them

• Doctor talked about prescription drugs you are taking

Got help you needed from doctor's office manage your care among different

providers.

providers

Data Source(s): QHP Enrollee Survey

Measure Name: Cervical Cancer Screening\*

Measure Steward: NCQA
NQF Endorsement ID: 0032

Description: The percentage of women 21-64 years of age who were screened for cervical cancer

using either of the following criteria:

• Women age 21-64 who had cervical cytology performed every 3 years.

• Women age 30-64 who had cervical cytology/human papillomavirus (HPV) co-

testing performed every 5 years.

Data Source(s): Administrative and Hybrid

Measure Name: Child and Adolescent Well-Care Visits<sup>69</sup>

Measure Steward: NCQA

NQF Endorsement ID: N/A

Description: The percentage of members 3-21 years of age who had at least one comprehensive

well-care visit with a PCP or an OB/GYN practitioner during the measurement year.

Data Source(s): Administrative

Measure Name: Childhood Immunization Status (Combination 3)\*

Measure Steward: NCQA
NQF Endorsement ID: 0038

<sup>&</sup>lt;sup>69</sup> CMS is assessing the impact of the changes made by the measure steward (NCQA) to the specifications for the Well-Child Visits in the Third, Fourth, Fifth and Sixth Years of Life measure that was renamed the Child and Adolescent Well-Care Visits measure. As part of the 2021 Call Letter process, CMS may propose to remove the Child and Adolescent Well-Care Visits measures from 2021 scoring.

Measure Name: Childhood Immunization Status (Combination 3)\*

Description: The percentage of children 2 years of age who had four diphtheria, tetanus and

acellular pertussis (DtaP); three polio (IPV); one measles, mumps and rubella (MMR); three H influenza type B (HiB); three hepatitis B (HepB); one chicken pox Varicella Zoster Virus (VZV); and four pneumococcal conjugate vaccines (PCV) by their second birthday. The measure calculates a rate for each vaccine and a combination

rate ("Combination 3").

Data Source(s): Administrative and Hybrid

Measure Name: Chlamydia Screening in Women

Measure Steward: NCQA
NQF Endorsement ID: 0033

Description: The percentage of women 16-24 years of age who were identified as sexually active

and who had at least one test for chlamydia during the measurement year.

Data Source(s): Administrative Data

Measure Name: Colorectal Cancer Screening\*

Measure Steward: NCQA

NQF Endorsement ID: 0034

Description: The percentage of patients 50-75 years of age who had appropriate screening for

colorectal cancer.

Data Source(s): Administrative and Hybrid

Measure Name: Comprehensive Diabetes Care: Eye Exam (Retinal) Performed\*

Measure Steward: NCQA
NQF Endorsement ID: 0055

Description: The percentage of members 18-75 years of age with diabetes (type 1 and type 2)

who received a retinal or dilated eye exam by an eye care professional (optometrist or ophthalmologist) in the measurement year or a negative retinal or dilated eye exam

(negative for retinopathy) by an eye care professional in the year prior to the

measurement year.

Data Source(s): Administrative Data and Hybrid

Measure Name: Comprehensive Diabetes Care: Hemoglobin A1c (HbA1c) Control (<8.0%)\*

Measure Steward: NCQA
NQF Endorsement ID: 0575

Description: The percentage of members 18-75 years of age with diabetes (type 1 and type 2)

whose most recent HbA1c level is <8.0% during the measurement year.

Data Source(s): Administrative and Hybrid

Measure Name: Comprehensive Diabetes Care: Medical Attention for Nephropathy\*

Measure Steward: NCQA
NQF Endorsement ID: 0062

Description: The percentage of members 18-75 years of age with diabetes (type 1 and type 2)

who received a nephropathy screening test or monitoring test or had evidence of

nephropathy during the measurement year.

Data Source(s): Administrative Data and Hybrid

Measure Name: Controlling High Blood Pressure\*

Measure Steward: NCQA
NQF Endorsement ID: 0018

Description: The percentage of members 18–85 years of age who had a diagnosis of hypertension

(HTN) and whose BP was adequately controlled during the measurement year based

on the following criteria:

• Members 18-59 years of age whose BP was <140/90 mm Hg.

Members 60–85 years of age with a diagnosis of diabetes whose BP was <140/90</li>

mm Hg.

Members 60–85 years of age without a diagnosis of diabetes whose BP was

<150/90 mm Hg.

Note: Use the Hybrid Method for this measure. A single rate is reported and is the

sum of all three groups.

Data Source(s): Hybrid Method must be used

Measure Name: Flu Vaccinations for Adults Ages 18-64

Measure Steward: NCQA
NQF Endorsement ID: 0039

Description: The percentage of members 18-64 years of age who received a flu vaccination

between July 1 of the measurement year and the date when the QHP Enrollee

Survey was completed.

Data Source(s): QHP Enrollee Survey

Measure Name: Follow-up After Hospitalization for Mental Illness (7-Day Follow-Up)

Measure Steward: NCQA
NQF Endorsement ID: 0576

Description: The percentage of discharges for members 6 years of age and older who were

hospitalized for treatment of selected mental illness diagnoses and who had a follow-

up visit with a mental health practitioner within 7 days of discharge.

Measure Name: Immunizations for Adolescents (Combination 2)\*

Measure Steward: NCQA
NQF Endorsement ID: 1407

Description: The percentage of adolescents 13 years of age who had one dose of meningococcal

conjugate vaccine, one tetanus, diphtheria toxoids and acellular pertussis (Tdap) vaccine and have completed the human papillomavirus (HPV) vaccine series by their 13th birthday. The measure calculates a rate for each vaccine and two combination

rates.

Data Source(s): Administrative and Hybrid

Measure Name: Initiation and Engagement of Alcohol and Other Drug Dependence Treatment\*

Measure Steward: NCQA

NQF Endorsement ID: 0004

Description: The percentage of adolescent and adult members with a new episode of alcohol or

other drug (AOD) dependence who received the following:

 Initiation of AOD Treatment. The percentage of members who initiated treatment through an inpatient AOD admission, outpatient visit, intensive outpatient encounter or partial hospitalization, telehealth or medication assisted treatment

(MAT) within 14 days of the diagnosis.

• Engagement of AOD Treatment. The percentage of members who initiated treatment and who had two or more additional AOD services or MAT within 34

days of the initiation visit.

Data Source(s): Administrative Data

Measure Name: International Normalized Ratio Monitoring for Individuals on Warfarin (INR)

Measure Steward: PQA

NQF Endorsement ID: 0555

Description: The percentage of members 18 years of age and older who had at least one 56-day

interval of warfarin therapy and who received at least one international normalized ratio (INR) monitoring test during each 56-day interval with active warfarin therapy.

Measure Name: Medical Assistance With Smoking and Tobacco Use Cessation\*

Measure Steward: NCQA
NQF Endorsement ID: 0027

Description: The following components of this measure assess different facets of providing

medical assistance with smoking and tobacco use cessation:

Advising Smokers and Tobacco Users to Quit. A rolling average represents the
percentage of members 18 years of age and older who are current smokers or
tobacco users and who received cessation advice during the measurement year.

 Discussing Cessation Medications: A rolling average represents the percentage of members 18 years of age and older who are current smokers or tobacco users and who discussed or were recommended cessation medications during the measurement year.

 Discussing Cessation Strategies: A rolling average represents the percentage of members 18 years of age and older who are current smokers or tobacco users who discussed or were provided smoking cessation methods or strategies during the measurement year.

Data Source(s): QHP Enrollee Survey

Measure Name: Plan Administration

Measure Steward: AHRQ, CMS (Measure consists of CAHPS® survey items and a survey item

developed for purposes of the QHP Enrollee Survey)

NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

Customer service gave necessary information/helpCustomer service staff courteous and respectful

• Wait-time to talk to customer service took longer than expected

• Forms were easy to fill out

Health plan explained purpose of forms

Data Source(s): QHP Enrollee Survey

Measure Name: Plan All-Cause Readmissions\*

Measure Steward: NCQA
NQF Endorsement ID: 1768

Description: For members 18-64 years of age, the number of acute inpatient stays during the

measurement year that were followed by an unplanned acute readmission for any diagnosis within 30 days and the predicted probability of an acute readmission. Data

are reported in the following categories:

• Count of Index Hospital Stays (IHS) (denominator).

• Count of 30-Day Readmissions (numerator).

· Count of Expected 30-day Readmissions.

Measure Name: Prenatal and Postpartum Care\*

Measure Steward: NCQA

NQF Endorsement ID: 1517 (Not Endorsed)

Description: The percentage of deliveries of live births on or between October 8 of the year prior to

the measurement year and October 7 of the measurement year. For these women, the measure assesses the following facets of prenatal and postpartum care:

Timeliness of Prenatal Care. The percentage of deliveries that received a
prenatal care visit as a member of the organization in the first trimester, on
the enrollment start date or within 42 days of enrollment in the organization.

Postpartum Care. The percentage of deliveries that had a postpartum visit

on or between 7 and 84 days after delivery.

Data Source(s): Administrative and Hybrid

Measure Name: Proportion of Days Covered

Measure Steward: PQA

NQF Endorsement ID: 0541

Description: The percentage of patients 18 years and older who met the proportion of days

covered (PDC) threshold of 80% during the measurement period. Report a rate for the following: Diabetes All Class, Renin Angiotensin System (RAS) Antagonists, and

Statins.

Data Source(s): Administrative Data

Measure Name: Rating of All Health Care

Measure Steward: AHRQ

NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

Rating of all health care

Data Source(s): QHP Enrollee Survey

Measure Name: Rating of Health Plan

Measure Steward: AHRQ

NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

Rating of health plan

Data Source(s): QHP Enrollee Survey

Measure Name: Rating of Personal Doctor

Measure Steward: AHRQ
NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

· Rating of personal doctor

Data Source(s): QHP Enrollee Survey

Measure Name: Rating of Specialist

Measure Steward: AHRQ
NQF Endorsement ID: 0006

Description: Enrollee experience related to the following:

· Rating of specialist

Data Source(s): QHP Enrollee Survey

Measure Name: Use of Imaging Studies for Low Back Pain\*

Measure Steward: NCQA

NQF Endorsement ID: 0052 (Not Endorsed)

Description: The percentage of members with a primary diagnosis of low back pain who did not

have an imaging study (plain X-ray, MRI, CT scan) within 28 days of the diagnosis.

Data Source(s): Administrative Data

Measure Name: Weight Assessment and Counseling for Nutrition and Physical Activity

**Children and Adolescents** 

Measure Steward: NCQA

NQF Endorsement ID: 0024

Description: The percentage of members 3-17 years of age who had an outpatient visit with a

primary care physician (PCP) or an obstetrician/gynecologist (OB/GYN) and who had

evidence of the following during the measurement year:

• Body mass index (BMI) percentile documentation.

Because BMI norms for youth vary with age and gender, this measure

evaluates whether BMI percentile is assessed rather than an absolute BMI

value.

· Counseling for nutrition.

· Counseling for physical activity.

Data Source(s): Administrative and Hybrid

Measure Name: Well-Child Visits in the First 30 Months of Life (6 or More Visits)\*

Measure Steward: NCQA
NQF Endorsement ID: 1392

Description: The percentage of members who turned 15 months old during the measurement year

and who had six or more well-child visits with a PCP during their first 15 months of

life.

# Appendix C. Crosswalk of 2021 QHP Enrollee Survey Questions Included in the QRS

Exhibit 21. Crosswalk of 2021 QHP Enrollee Survey Questions Included in the QRS

This crosswalk maps each QRS survey measure to the relevant QHP Enrollee Survey item(s).

2021 QRS Survey Measure	2021 QHP Enrollee Survey Composite	Question Number	Question Wording	Question Source
Access to Care	Getting Care Quickly	22	In the last 6 months, when you needed care right away, in an emergency room, doctor's office, or clinic, how often did you get care as soon as you needed? <i>Include in-person, telephone, or video appointments.</i>	CAHPS® Health Plan 5.0
		23	In the last 6 months, how often did you get an appointment for a check-up or routine care at a doctor's office or clinic as soon as you needed? Include in-person, telephone or video appointments. <i>Include in-person, telephone, or video appointments</i> .	CAHPS® Health Plan 5.0
	Getting Needed Care	25	In the last 6 months, how often was it easy to get the care, tests, or treatment you needed? Include in-person, telephone or video appointments. <i>Include in-person, telephone, or video appointments.</i>	CAHPS® Health Plan 5.0
		41	In the last 6 months, how often did you get an appointment to see a specialist as soon as you needed? Include in-person, telephone or video appointments. <i>Include in-person, telephone, or video appointments</i> .	CAHPS® Health Plan 5.0
Access to Information	Access to Information <sup>70</sup>	3	In the last 6 months, how often did the written materials or the Internet provide the information you needed about how your health plan works?	CAHPS® Health Plan 4.0 — Supplemental Items (HEDIS®)
		4	In the last 6 months, how often were you able to find out from your health plan how much you would have to pay for a health care service or equipment before you got it?	CAHPS® Health Plan 4.0 — Supplemental Items (HEDIS®)
		5	In the last 6 months, how often were you able to find out from your health plan how much you would have to pay for specific prescription medicines?	CAHPS® Health Plan 4.0 — Supplemental Items (HEDIS®)
Care Coordination	Care Coordination	33	When you visited your personal doctor for a scheduled appointment in the last 6 months, how often did he or she have your medical records or other information about your care? Include in-person, telephone or video appointments.	CAHPS® Health Plan 5.0 — Supplemental Items
		34	In the last 6 months, when your personal doctor ordered a blood test, x-ray, or other test for you, how often did someone from your personal doctor's office follow up to give you those results?	CAHPS® Health Plan 5.0 — Supplemental Items

<sup>&</sup>lt;sup>70</sup> These items come from the National Committee for Quality Assurance (NCQA) HEDIS® CAHPS® Survey.

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2021 QRS Survey Measure	2021 QHP Enrollee Survey Composite	Question Number	Question Wording	Question Source
Care Coordination (continued)	Care Coordination (continued)	35	In the last 6 months, when your personal doctor ordered a blood test, x-ray, or other test for you, how often did you get those results as soon as you needed them?	CAHPS® Health Plan 5.0 — Supplemental Items
		43	In the last 6 months, how often did your personal doctor seem informed and up-to-date about the care you got from specialists?	CAHPS® Health Plan 5.0 — Supplemental Items
		36	In the last 6 months, how often did you and your personal doctor talk about all the prescription medicines you were taking?	CAHPS® Health Plan 5.0 — Supplemental Items
		39	In the last 6 months, how often did you get the help that you needed from your personal doctor's office to manage your care among these different providers and services?	CAHPS® Health Plan 5.0 — Supplemental Items
Plan Administration	Plan Administration	6	In the last 6 months, how often did your health plan's customer service give you the information or help you needed?	CAHPS® Health Plan 5.0
		7	In the last 6 months, how often did your health plan's customer service staff treat you with courtesy and respect?	CAHPS® Health Plan 5.0
	Single Item Measure (Plan Administration)	8	In the last 6 months, how often did the time that you waited to talk to your health plan's customer service staff take longer than you expected?	New Question developed for QHP Enrollee Survey
		9	In the last 6 months, how often were the forms from your health plan easy to fill out?	CAHPS® Health Plan 5.0
		10	In the last 6 months, how often did the health plan explain the purpose of a form before you filled it out?	CAHPS® Health Plan 5.0 — Supplemental Items
Rating of all Health Care	Single Item Measure	27	Using any number from 0 to 10, where 0 is the worst health care possible and 10 is the best health care possible, what number would you use to rate all your health care in the last 6 months? Include in-person, telephone or video appointments.	CAHPS <sup>®</sup> Health Plan 5.0
Rating of Health Plan	Single Item Measure	20	Using any number from 0 to 10, where 0 is the worst health plan possible and 10 is the best health plan possible, what number would you use to rate your health plan in the last 6 months?	CAHPS® Health Plan 5.0
Rating of Personal Doctor	Single Item Measure	40	Using any number from 0 to 10, where 0 is the worst personal doctor possible and 10 is the best personal doctor possible, what number would you use to rate your personal doctor?	CAHPS® Health Plan 5.0
Rating of Specialist	Single Item Measure	44	We want to know your rating of the specialist you saw most often in the last 6 months. Using any number from 0 to 10, where 0 is the worst specialist possible and 10 is the best specialist possible, what number would you use to rate the specialist?	CAHPS <sup>®</sup> Health Plan 5.0

2021 QRS Survey Measure	2021 QHP Enrollee Survey Composite	Question Number	Question Wording	Question Source
Flu Vaccinations for Adults Ages 18–64	Single Item Measure (Preventive Services)	47	Have you had either a flu shot or flu spray in the nose since July 1, 2017?	CAHPS® 5.0H <sup>71</sup> Survey
Medical Assistance with Smoking and Tobacco Use Cessation	Single Item Measure (Preventive Services)	49	In the last 6 months, how often were you advised to quit smoking or using tobacco by a doctor or other health provider in your plan?	CAHPS® 5.0H Survey
		50	In the last 6 months, how often was medication recommended or discussed by a doctor or health provider to assist you with quitting smoking or using tobacco? Examples of medication are: nicotine gum, patch, nasal spray, inhaler, or prescription medication.	CAHPS® 5.0H Survey
		51	In the last 6 months, how often did your doctor or health provider discuss or provide methods and strategies other than medication to assist you with quitting smoking or using tobacco? Examples of methods and strategies are: telephone helpline, individual or group counseling, or cessation program.	CAHPS <sup>®</sup> 5.0H Survey

<sup>71</sup> National Committee for Quality Assurance (NCQA) HEDIS® CAHPS® Survey.

# Appendix D. Final 2021 QRS Rating Methodology

#### STEP 1: CALCULATE MEASURE RATES

If a QHP issuer **submitted a valid** measure rate for the reporting unit, then a numeric result will appear in the Raw Value field for the measure in the QRS Proof Sheet.

If a QHP issuer **did not submit a valid** measure rate for the reporting unit, then an invalid code will appear in the Raw Value field for the measure in the QRS Proof Sheet (and a null value [a dash, "-"] will appear in the Denominator Size field). A measure rate is considered invalid if the reporting unit received one of the audit designations provided in Exhibit 22.

**Exhibit 22. Audit Designations** 

Audit Designation	Meaning
Benefit Not Offered (NB)  The QHP issuer did not offer the health benefit required by the measurement of the company of the co	
Biased Rate (BR)	The QHP issuer's calculated rate was materially biased.
Not Reported (NR)	The QHP issuer chose not to report the measure.

Invalid measure data is not used in scoring, meaning not used in Step 3 (Calculate Standardized Measure Scores) or beyond. Invalid measure data is assigned an invalid code, **NC** (**Not Calculated**), for the measure score (i.e., shown in the Standardized score field).

**Measures not used in scoring:** For measures not included in scoring, the QRS Proof Sheet includes an invalid code, **M-NS** (**Measure – Not Scored**), for the measure score (i.e., shown in the Standardized score field). If a composite score cannot be calculated due to inability to pass the half-scale rule, then the reporting unit receives the invalid code, **Component Score or Rating – Not Scored (CSR-NS)**.

For all measures, CMS calculates measure rates (raw values) for QRS clinical and survey measures as described in detail below.

#### **QRS Clinical Measures**

For QRS clinical measures composed of multiple indicators, CMS uses various aggregation methods to calculate a measure rate per the measure's technical specifications. See Exhibit 23 for a summary of each method; further detail can be found in the 2021 Quality Rating System Measure Technical Specifications.

Exhibit 23. Aggregation Methods for QRS Clinical Measures with Multiple Indicators

Exhibit 23. Aggregation wethous for 2x3 official measures with martiple indicators				
Measure (M)	Measure Indicator (MI)  * indicates below sub-measure indicator <sup>72</sup>	Method for Calculating Measure Rate	Method for Calculating Total Measure Denominator Size	
Annual Dental Visit	<ul> <li>Annual Dental Visit (2-3 Years)</li> <li>Annual Dental Visit (4-6 Years)</li> <li>Annual Dental Visit (7-10 Years)</li> <li>Annual Dental Visit (11-14 Years)</li> <li>Annual Dental Visit (15-18 Years)</li> <li>Annual Dental Visit (19-21 Years)</li> </ul>	$\frac{\sum Numerator}{\sum Denominator}^{73}$	Sum of MI denominators	
Antidepressant Medication Management	Antidepressant Medication Management:     Acute     Antidepressant Medication Management:     Continuation	Average of MI rates	Average of MI denominators	
Chlamydia Screening in Women	<ul><li>Chlamydia Screening (16-20 Years)</li><li>Chlamydia Screening (21-24 Years)</li></ul>	$rac{\sum Numerator}{\sum Denominator}$	Sum of MI denominators	
Initiation and Engagement of Alcohol and Other Drug (AOD) Dependence	Initiation of Alcohol and Other Drug Dependence Treatment (Total)     Initiation (13-17) *74     Alcohol Abuse or Dependence     Opioid Abuse or Dependence     Other Drug Abuse or Dependence     Initiation (18+) *     Alcohol Abuse or Dependence     Opioid Abuse or Dependence     Other Drug Abuse or Dependence     Other Drug Abuse or Dependence     Engagement of Alcohol and Other Drug Dependence Treatment (Total)     Engagement (13-17) *     Alcohol Abuse or Dependence     Opioid Abuse or Dependence     Other Drug Abuse or Dependence     Engagement (18+) *     Alcohol Abuse or Dependence     Opioid Abuse or Dependence     Opioid Abuse or Dependence     Other Drug Abuse or Dependence     Other Drug Abuse or Dependence	<ul> <li>Three Steps:</li> <li>1. Sub-MI = Count of unique enrollees per age band across treatments (b-sub-MIs)</li> <li>2. ΣNumerator<sub>sub-MI</sub> ΣDenominator<sub>sub-MI</sub></li> <li>3. Average of MI rates</li> </ul>	Three Steps:  1. Sub-MI = Count of unique enrollees per age band across treatments (b-sub-MIs)  2. ∑Denominator <sub>sub-MI</sub> 3. Average of MI denominators	
Plan All-Cause Readmissions	Observed Readmission     (Numerator/Denominator) Total     Average Adjusted Probability Total	Observed Readmission divided by Average Adjusted Probability	Sum of MI denominators	

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<sup>&</sup>lt;sup>72</sup> Below sub-measure indicators (b-sub-MI) are rates for a single age-band across several assessment areas; they are aggregated together to calculate the sub-MI rate estimate for a single assessment area.

<sup>&</sup>lt;sup>73</sup> The measure rate is calculated via a sum of MI numerators divided by the sum of MI denominators. The numerator of a given MI rate can be calculated by multiplying the MI rate by the denominator for the MI.

<sup>&</sup>lt;sup>74</sup> Sub-measure indicators (sub-MIs) are combined via an average (sum of numerators divided by sum of denominators) to create the rate for a measure indicator (MI).

Measure (M)	Measure Indicator (MI)  * indicates below sub-measure indicator <sup>72</sup>	Method for Calculating Measure Rate	Method for Calculating Total Measure Denominator Size
Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents	Body Mass Index (BMI) Percentile Documentation  BMI Percentile – 3-11 Years *  BMI Percentile – 12-17 Years *  Counseling for Nutrition  Counseling for nutrition – 3-11 Years *  Counseling for nutrition – 12-17 Years *  Counseling for Physical Activity  Counseling for Physical Activity – 3-11 Years *  Counseling for Physical Activity – 12-17 Years *	Two Steps:  1. $\frac{\sum Numerator_{Sub-MI}}{\sum Denominator_{Sub-MI}}$ 2. Average of MI rates	Two Steps:  1. ∑ Denominator <sub>sub-MI</sub> 2. Average of MI denominators
Medical Assistance with Smoking and Tobacco Use Cessation <sup>75</sup>	<ul> <li>How Often Advised to Quit Smoking or Using Tobacco</li> <li>How Often Advised to Quit Smoking or Using Tobacco (Previous Year)</li> <li>How Often Medication Recommended or Discussed</li> <li>How Often Medication Recommended or Discussed (Previous Year)</li> <li>How Often Provided Strategies to Quit (Previous Year)</li> </ul>	Two Steps:  1. $\frac{\sum Numerator_{sub-MI}}{\sum Denominator_{sub-MI}}$ 2. Average of MI rates	Two Steps:  1. ∑Denominator <sub>sub-MI</sub> 2. Average of MI denominators

## **QRS Survey Measures**

For QRS survey measures, CMS calculates measure rates from QHP Enrollee Survey questions.

QRS survey measures are grouped into two categories:

- (1) **CAHPS®-based:** Consumers' experience of care measures based on the Consumer Assessment of Healthcare Providers and Systems (CAHPS®), and
- (2) **Clinical measures captured in QHP Enrollee Survey:** Selected clinical measures based on the Healthcare Effectiveness Data and Information Set (HEDIS®).

CMS calculates QRS survey measure rates according to the scoring specifications described below.

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<sup>&</sup>lt;sup>75</sup> Per the measure technical specifications, the *Medical Assistance with Smoking and Tobacco Use Cessation* (Tobacco) measure is calculated as a rolling average based on sub-MI data. Typically, CMS uses the data reported in the prior year and the ratings year to calculate a two-year rolling average. Due to the suspension of data collection in 2020 in response to the COVID-19 public health emergency, CMS will calculate the rolling average using the last year of available data for the Tobacco measure (i.e., 2019) and data from the current ratings year (i.e., 2021). CMS merges information for a given reporting unit from the prior year onto the data from the ratings year to calculate the measure score. The Tobacco sub-MIs are reported in the QRS Proof Sheets as M25a1-M25c1 and M25a2-M25c2, respectively. For reporting units that were ineligible to receive a QRS rating in the prior year, CMS uses the reported rates from the prior year and current year to calculate the Tobacco measure score, even though the reporting unit was not ratings-eligible in the prior year. For example, if a reporting unit is newly eligible to receive a QRS rating in 2021, CMS will use the reporting unit's reported data for 2019 and 2021 to calculate the Tobacco measure score.

## CAHPS®-based QRS Survey Measures

CMS calculates CAHPS®-based QRS survey measures with an approach similar to the one CMS uses in the Medicare Advantage-Prescription Drug Program (MA-PDP) quality measurement initiative for data collected through the MA-PDP CAHPS® survey.<sup>76</sup>

CMS calculates QRS survey measures rates from the QHP Enrollee Survey using the CAHPS® Analysis Program ("CAHPS® Macro"), which was developed by the CAHPS® Consortium under the auspices of the Agency for Healthcare Research and Quality (AHRQ). A comprehensive description of the calculations performed by the CAHPS® Macro, including additional information on weighting and case-mix adjustment, can be found in *Instructions for Analyzing Data from CAHPS Surveys*.

To adjust for any systematic biases with the enrollee response data, CMS applies a case-mix adjustment to the QHP Enrollee Survey response data and uses the adjusted data when calculating the QRS survey measures. It is common in survey-based applications to case-mix adjust for such factors as overall health status, age, and education to account for biases due to survey response tendencies. The QHP Enrollee Survey variables used in the case-mix adjustment include the following: general health rating, mental health rating, chronic conditions/medications, age, education, survey language, help with the survey, and survey mode. The final variables to be included in the case-mix adjustment will be determined based on additional analysis of the 2021 QHP Enrollee Survey data.

All CAHPS®-based measures are based on weighted, case-mix adjusted means. CMS uses person-level sampling weights to account for the different probabilities of selection across reporting units. The weights are calculated as follows:

$$Final\ Weight\ = \left(\frac{M}{n\_s}\right) * k$$

Where:

n\_s = Total number of sampled enrollees in the sampling unit;

M = Total number of records in the sampling unit after-de-duplication;

k = Number of eligible enrollees covered by the Subscriber or Family ID (SFID) that covers the sampled enrollee.

As shown below, all CAHPS®-based questions should be coded so higher values represent more positive responses.

## **Rating of Health Plan**

Question 20 in the 2021 QHP Enrollee Survey asks, "Using any number from 0 to 10, where 0 is the worst health plan possible and 10 is the best health plan possible, what number would you use to rate your health plan in the last 6 months?" Use the following steps to calculate the QRS measure rate for Rating of Health Plan:

<sup>&</sup>lt;sup>76</sup> General background information about the scoring of CAHPS®-based measures in the MA-PDP program is presented in the *MA-PDP CAHPS® Survey: Quality Assurance Protocols and Technical Specifications* (http://www.ma-pdpcahps.org/).

- 1. Calculate the weighted, case-mix adjusted mean for question 20.
- 2. Transform to a 0 100 scale as follows: score = [(x a)/(b a)]\*100, where x = the weighted, case-mix adjusted mean from step 1; a = minimum possible value of x; and b = maximum possible value of x. This is the QRS measure rate for Rating of Health Plan.
  - **Note:** This rescaling allows the presentation of different measures on a common metric; the transformation to a 0-100 scale applies to all QRS survey measures that are CAHPS®-based.

## **Rating of All Health Care**

Question 27 in the 2021 QHP Enrollee Survey asks, "Using any number from 0 to 10, where 0 is the worst health care possible and 10 is the best health care possible, what number would you use to rate all your health care in the last 6 months?" To calculate the QRS measure rate for Rating of All Health Care measure, use the same steps that were used to calculate the rate for Rating of Health Plan.

## **Rating of Personal Doctor**

Question 40 in the 2021 QHP Enrollee Survey asks, "Using any number from 0 to 10, where 0 is the worst personal doctor possible and 10 is the best personal doctor possible, what number would you use to rate your personal doctor?" To calculate the QRS measure rate for Rating of Personal Doctor, use the same steps that were used to calculate the rate for Rating of Health Plan.

#### **Rating of Specialist**

Question 44 in the 2021 QHP Enrollee Survey asks, "We want to know your rating of the specialist you saw most often in the last 6 months. Using any number from 0 to 10, where 0 is the worst specialist possible and 10 is the best specialist possible, what number would you use to rate the specialist?" To calculate the QRS measure rate for Rating of Specialist, use the same steps that were used to calculate the score for Rating of Health Plan.

#### **Access to Care**

The QRS Access to Care measure is made up of four questions, all of which are coded on a 1-4 scale in the 2021 QHP Enrollee Survey (i.e., 1 = Never, 2 = Sometimes, 3 = Usually, and 4 = Always). Use the following steps to calculate the QRS measure rate for Access to Care:

- 1. Calculate the weighted, case-mix adjusted mean separately for each item included in the Access to Care measure:
  - Question 22: In the last 6 months, when you needed care right away, how often did you get care as soon as you needed?
  - Question 23: In the last 6 months, how often did you get an appointment for a check-up or routine care at a doctor's office or clinic as soon as you needed?
  - Question 25: In the last 6 months, how often was it easy to get the care, tests, or treatment you needed?
  - Question 41: In the last 6 months, how often did you get an appointment to see a specialist as soon as you needed?

- 2. Calculate the average of the weighted, case-mix adjusted means across the four survey questions; use equal weighing of the questions.
- 3. Transform the average from Step 2 to a 0 100 scale (use the same formula as described in Step 2 for Rating of Health Plan). This is the QRS measure rate for Access to Care.

#### **Care Coordination**

The QRS Care Coordination measure is made up of six questions, all of which are coded on a 1 – 4 scale in the 2021 QHP Enrollee Survey (i.e., 1 = Never, 2 = Sometimes, 3 = Usually, and 4 = Always). Use the following steps to calculate the QRS measure rate for the Care Coordination measure:

- 1. Questions 34 and 35 are combined into a single measure to assess getting results after a blood test, x-ray, or other test. Calculate the average of the weighted, case-mix adjusted means for Questions 22 and 23 using equal weighting of the two questions. Use this average in Step 3.
- 2. Calculate the weighted, case-mix adjusted mean separately for each question included in the Care Coordination measure:
  - Question 33: When you visited your personal doctor for a scheduled appointment in the last 6 months, how often did he or she have your medical records or other information about your care?
  - Question 34: In the last 6 months, when your personal doctor ordered a blood test, x-ray, or other test for you, how often did someone from your personal doctor's office follow up to give you those results?
  - Question 35: In the last 6 months, when your personal doctor ordered a blood test, x-ray, or other test for you, how often did you get those results as soon as you needed them?
  - Question 43: In the last 6 months, how often did your personal doctor seem informed and up-to-date about the care you got from specialists?
  - Question 36: In the last 6 months, how often did you and your personal doctor talk about all the prescriptions you were taking?
  - Question 39: In the last 6 months, how often did you get the help that you needed from your personal doctor's office to manage your care among these different providers and services?
- 3. Calculate the average of the weighted, case-mix adjusted means across the five survey questions (i.e., Questions 33, 43, 28, and 39, and the average of Questions 34 and 35 from Step 2); use equal weighting of the questions.
- 4. Transform the average from Step 3 to a 0-100 scale (use the same formula as described in Step 2 for Rating of Health Plan). This is the QRS measure rate for Care Coordination.

#### **Access to Information**

The QRS Access to Information measure is made up of three questions, all of which are coded on a 1-4 scale in the 2021 QHP Enrollee Survey (i.e., 1 =Never, 2 =Sometimes, 3 =Usually, and 4 =Always). Use the following steps to calculate the QRS measure rate for Access to Information:

- 1. Calculate the weighted, case-mix adjusted mean separately for each item included in the Access to Information measure:
  - Question 3: In the last 6 months, how often did the written materials or the Internet provide the information you needed about how your health plan works?
  - Question 4: In the last 6 months, how often were you able to find out from your health plan how much you would have to pay for a health care service or equipment before you got it?
  - Question 5: In the last 6 months, how often were you able to find out from your health plan how much you would have to pay for specific prescription medicines?
- 2. Calculate the average of the weighted, case-mix adjusted means across the three survey questions; use equal weighing of the questions.
- 3. Transform the average from Step 2 to a 0 100 scale (use the same formula as described in Step 2 for Rating of Health Plan). This is the QRS measure rate for Access to Information.

#### **Plan Administration**

The QRS Plan Administration measure is made up of five questions, all of which are coded on a 1-4 scale in the 2021 QHP Enrollee Survey (i.e., 1 =Never, 2 =Sometimes, 3 =Usually, and 4 =Always). Use the following steps to calculate the QRS score for the Plan Administration measure:

- 1. Calculate the weighted, case-mix adjusted mean separately for each item included in the Plan Administration measure:
  - Question 6: In the last 6 months, how often did your health plan's customer service give you the information or help you needed?
  - Question 7: In the last 6 months, how often did your health plan's customer service staff treat you with courtesy and respect?
  - Question 8: In the last 6 months, how often did the time that you waited to talk to your health plan's customer service staff take longer than you expected?
    - Note: To make the direction of coding of Question 8 consistent with the other questions, Question 8 needs to be recoded so higher values represent a more positive response, as follows:

Category	Original	Code Recode
Never	1	4
Sometimes	2	3
Usually	3	2
Always	4	1

- Question 9: In the last 6 months, how often were the forms from your health plan easy to fill out?
- Question 10: In the last 6 months, how often did the health plan explain the purpose of a form before you filled it out?
- 2. Calculate the average of the weighted, case-mix adjusted means across the five survey questions; use equal weighing of the questions.
- 3. Transform the average from Step 2 to a 0 100 scale (use the same formula as described in Step 2 for Rating of Health Plan). This is the QRS measure rate for Plan Administration.

## **QRS Clinical Measures Captured in QHP Enrollee Survey**

The following QRS survey measures are clinical in nature:

- Flu Vaccinations for Adults Ages 18-64
- Medical Assistance with Smoking and Tobacco Use Cessation

Scoring specifications for the clinical measures collected through the 2021 QHP Enrollee Survey follow the HEDIS® specifications as defined by NCQA., CMS applies the QRS clinical measure denominator criterion of 30 to all clinical measures captured in the QHP Enrollee survey. The scoring procedures are described below. These specifications are also presented in the 2021 Quality Rating System Measure Technical Specifications.

## Flu Vaccinations for Adults Ages 18-64

The QRS survey measure captures the proportion of eligible plan enrollees who received a flu vaccination. The following steps are used for calculating the QRS survey measure (flu\_shot):

- 1. Select eligible enrollees:
  - Include:
    - Enrollees age 18-64 (to determine eligibility use flu\_flag from the sample frame, which indicates eligibility for the flu shot based on the person's age as of July 1, 2020).
  - Exclude:
    - Respondents with a missing value code on flu\_shot (i.e., respondents coded as -1, -3, or 3 on flu\_shot).
- 2. Calculate the proportion of eligible enrollees for whom flu\_shot=1 to create the final QRS survey measure rate for Flu Vaccinations for Adults Ages 18-64.

**Note:** The proportion is <u>not</u> weighted and is <u>not</u> case-mix adjusted.

#### Medical Assistance with Smoking and Tobacco Use Cessation

The QRS survey measure is made up of three items/indicators, all of which are coded on a 1-4 scale in the questionnaire. All items require two years of data collection.

The inclusion/exclusion criteria for the measure includes the following steps:

- 1. Select eligible enrollees (the criteria for each of the three indicators follow separately):
  - Advising Smokers and Tobacco Users to Quit (advised\_quit\_tob):
  - Include:
    - o Current smokers or tobacco user (i.e., respondents coded as 1 or 2 on use\_tobacco).
  - Exclude:
    - Respondents with a missing value code on advised\_quit\_tob (i.e., respondents coded as -1, -2, -3, or -7 on advised\_quit\_tob).

Discussing Cessation Medications (recommend tob meds):

- Include:
  - o Current smokers or tobacco user (i.e., respondents coded as 1 or 2 on use\_tobacco).
- Exclude:
  - o Respondents with a missing value code on recommend\_tob\_meds (i.e., respondents coded as -1, -2, -3, or -7 on recommend\_tob\_meds).

Discussing Cessation Strategies (discuss\_tob\_non\_meds):

- Include:
  - o Current smokers or tobacco user (i.e., respondents coded as 1 or 2 on use\_tobacco).
- Exclude:
  - o Respondents with a missing value code on discuss\_tob\_non\_meds (i.e., respondents coded as -1, -2, -3, or -7 on discuss\_tob\_non\_meds).
- 2. Calculate the unadjusted proportion of respondents who indicated on each item included in the measure that they received some level of advice/discussion (i.e., proportion on each item with codes of sometimes, usually, or always).

**Note:** The proportion is <u>not</u> weighted and <u>not</u> case-mix adjusted. These are the indicators used in the calculation of the QRS survey measure rate for Medical Assistance with Smoking and Tobacco Use Cessation:

- advised\_quit\_tob (i.e., proportion of respondents coded as 2, 3, or 4),
- recommend\_tob\_meds (i.e., proportion of respondents coded as 2, 3, or 4),
- discuss\_tob\_non-meds (i.e., proportion of respondent coded as 2, 3, or 4).

#### STEP 2: DETERMINE SCORING STATUS AND APPLICATION OF DENOMINATOR CRITERIA

For each reporting unit, CMS assesses whether measure data can be included in QRS scoring based on the reporting unit's ratings eligibility status, and each measure's denominator size. A reporting unit is considered ratings-eligible if it has operated in an Exchange for three consecutive years and meets the minimum enrollment criteria (i.e., more than 500 enrollees as of July 1 of the prior year [i.e., 2020] and the ratings year [i.e., 2021]).

Reporting units that do not meet the ratings eligibility criteria are removed from scoring and will receive an invalid code. Similarly, while QHP issuers submit measure data to CMS regardless of denominator size, measures that do not meet the minimum denominator criteria for scoring (see Exhibit 24) are excluded from QRS scoring.

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Measure	Minimum Denominator Criteria for Inclusion in QRS Scoring		
QRS Clinical Measure	30		
PCR measure	150		
QRS Clinical Measures Captured in QHP Enrollee Survey	30		
QRS CAHPS®-based Survey Measure	100		

Exhibit 24. Minimum Denominator Size Required for Inclusion in QRS Scoring

The minimum denominator size of 100 applies to all QRS CAHPS®-based survey measures, regardless of the number of survey questions associated with the measure. The minimum denominator size of 30 applies to all QRS clinical measures (including those clinical measures captured in the 2021 QHP Enrollee Survey), with the exception of the PCR measure.

For measures with an insufficient denominator size, CMS assigns the measure an invalid code (i.e., NC/Not Calculated) and excludes the measure from scoring.

#### **QRS Clinical Measures**

**For QRS clinical measures**, CMS determines if the minimum denominator size is met based on the measure's total denominator size. Different measures have different aggregation methods, as shown in Exhibit 25.

As shown in the illustrative example in Exhibit 25, the *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents* measure has three indicators. For this example reporting unit, the measure's denominator size of 995 meets the minimum denominator size criteria of 30. Therefore, CMS will use this measure data in QRS scoring (i.e., proceed to use this measure data in the standardization procedures described in Step 3).

Name	Denominator Size		
BMI percentile documentation (Indicator)	1641		
Counseling for nutrition (Indicator)	17		
Counseling for physical activity (Indicator)	1327		
Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents (Measure)	995		

Exhibit 25. Example Denominator Size for QRS Clinical Measure Indicators

## CAHPS®-based QRS Survey Measures

For CAHPS®-based QRS survey measures, CMS determines if the minimum denominator size is met based on the measure's total denominator size. The denominator size for the measure is equal to the total number of *unique* respondents who provided a response to at least one of the questions.

Exhibit 26 shows an example (using mock data) of denominator size calculation for the CAHPS®-based QRS survey measure *Access to Care*. *Access to Care* is composed of four questions. As shown, there can be valid denominator observations for each of the four questions that are *lower* than 100 and yet the measure denominator size can still be *greater* than 100. Enrollees are not required to respond to all survey questions to be included in a given measure's denominator or rate. The total measure denominator size (161), meaning that 161 unique respondents answered across the four questions needed to calculate *Access to Care*, is greater than the minimum denominator size needed for QRS scoring (100). Therefore, CMS calculates the average of the case-mix adjusted mean across the four survey questions to obtain the Access to Care measure score.

Exhibit 26. Example of Total Denominator Size Calculation for CAHPS®-Based QRS Survey Measure

QRS Component	Name	Question Details	Denominator Size
Indicator	CAHPS <sup>®</sup> Getting Care Quickly: Non-Urgent Care	Question 6: In the last 6 months, how often did you get an appointment for a check-up or routine care at a doctor's office or clinic as soon as you needed?	136
Indicator	CAHPS <sup>®</sup> Getting Care Quickly: Urgent Care	Question 4: In the last 6 months, when you needed care right away, how often did you get care as soon as you needed?	77
Indicator	CAHPS® Getting Needed Care: Easy Care, Tests, or Treatment	Question 9: In the last 6 months, how often was it easy to get the care, tests, or treatment you needed?	146
Indicator	CAHPS® Getting Needed Care: Easy to See Specialist	Question 33: In the last 6 months, how often did you get an appointment to see a specialist as soon as you needed?	90
Measure	Access to Care		161

## STEP 3: CALCULATE STANDARDIZED MEASURE SCORES

CMS calculates standardized measure scores by independently transforming the raw measure rate using Z-standardization and comparing measure rate values of each reporting unit to the mean measure rate based on one national, all-product reference group (i.e., not stratified by any characteristics, such as product type or Exchange). The scores reflect how well a reporting unit did compared to the other reporting units in a given measure.

CMS uses a Z-score approach to transform all raw measure rates, independently, by calculating each measure's respective mean and standard deviation. The Z-score approach compares a reporting unit's measure rate values to the mean measure rate and standardized deviation of all available reporting units at a national level. After Z-scoring, the standardized values are

converted to a 0 to 100 scale, using a normal curve equivalent (NCE).<sup>77</sup> All values under 0 or over 100 are truncated to 0 or 100, respectively.<sup>78</sup> Reporting units with tied measure rates will receive the same standardized score without impacting the preceding or proceeding reporting units' scores.<sup>79</sup> CMS excludes reporting units that do not meet the minimum denominator criterion from standardization.

For example, as shown in Exhibit 27, CMS uses the valid rates for the *Cervical Cancer Screening* measure across all reporting units to calculate the mean and standard deviation, across all products (i.e., EPO, HMO, POS, and PPO) and all Exchanges. If a QHP issuer's HMO product has a measure rate (raw value) equal to the mean of the measure, the product's Z-score equals zero. From here, the Z-score is converted to a 0-100 scale using the NCE, and then converted to a standardized score of 50.

Exhibit 27. Example Score after Z-score Standardization

Measure Name	Raw Value	Standardized Score
Cervical Cancer Screening	0.82	50.0000

Summary Statistics for Cervical Cancer Screening (CCS):  $\hat{\mu}_{CCS} = 0.82$ ,  $\hat{\sigma}_{CCS} = 2.15$ 

$$Z - Score = \frac{(0.82 - 0.82)}{2.15} = 0$$

Converted value using NCE: 50 + 49/qnorm(.99) \* Z - Score

Reporting Unit Standardized Score for CCS: 50 + 21.063 \* (0) = 50

#### STEP 4: CALCULATE COMPOSITE SCORES

CMS calculates composite scores, like other QRS component scores (i.e., domains and summary indicators), by averaging (unweighted) scores.

CMS calculates composite scores based on averages of standardized QRS measure scores. The steps are as follows:

1. Determine if the composite score can be calculated. CMS uses a *half-scale rule* to determine if the composite score can be calculated. The half-scale rule allows calculation of the score only if at least half (>50%) of the associated measures in the composite have a valid score (i.e., measure results met the minimum denominator criteria as defined in Step 2 and therefore received a score). Otherwise, the composite cannot be calculated and does not receive a score. When applying the half-scale rule for composite score calculation, CMS only considers measures that are included in scoring.

<sup>&</sup>lt;sup>77</sup> The NCE is a standardization method used to rescale values onto a 0-100 scale. While similar to a percentilerank, the NCE differs by preserving the distance between values, such that differences between z-scores reflect real differences in the underlying data. The closer the underlying data follows a normal distribution, the closer the transformed z-scores mimic the percentiles of the normal distribution at 1, 50, and 99. The property fails the further the underlying data is from normal.

<sup>&</sup>lt;sup>78</sup> This is an artifact from the conversion using NCE.

<sup>&</sup>lt;sup>79</sup> Prior to the 2018 ratings year, CMS used the PROC RANK standardization approach. Under the PROC RANK approach reporting units with tied measure rates were assigned the value of the average rank.

If the composite score cannot be calculated due to inability to pass the half-scale rule, then the reporting unit receives the following invalid code:

- **CSR I:** Insufficient data to calculate a score according to the QRS rating methodology.
- **2.** Calculate the composite score. If the composite score can be calculated according to the half-scale rule, CMS averages the available measure scores.

Exhibit 28 shows how a composite is calculated from measure scores using mock data.

Exhibit 28. Example Composite Score Calculation

Measure	Type of QRS Component	Score
Appropriate Testing for Pharyngitis	Measure	NC (Invalid code NC assigned due to invalid measure rate [NR audit designation]) defined in <b>Appendix G</b> .
Appropriate Treatment for Upper Respiratory Infection	Measure	99.5169
Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis	Measure	10.4982
Use of Imaging Studies for Low Back Pain	Measure	NC (Invalid code NC assigned due to invalid measure rate [NR audit designation])
Efficient Care	Composite	55.0076  Note, the composite score can be calculated because two of the four available measures (Appropriate Treatment for Upper Respiratory Infection and Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis) received valid scores (equal to 50%).

## STEP 5: CALCULATE DOMAIN SCORES

CMS calculates domain scores based on averages of composite scores. The steps are as follows:

- 1. Determine if the domain score can be calculated. To calculate the domain score, CMS uses the *half-scale rule* to determine if at least half (>50%) of the associated composites have a valid score. If the domain score cannot be calculated, it will not reflect a score (i.e., will receive an invalid result of CSR-I).
- **2.** Calculate the domain score. If the domain score can be calculated, CMS averages the available composite scores. An example using mock data is shown in Exhibit 29.

Exhibit 29. Example Domain Score Calculation

Name	Type of QRS Component	Score
Checking for Cancer	Composite	99.6599
Maternal Health	Composite	99.4186
Staying Healthy Adult	Composite	55.0076
Staying Healthy Child	Composite	80.3985
Prevention	Domain	83.6211 (Average of available composite scores)

## STEP 6: CALCULATE SUMMARY INDICATOR SCORES

CMS calculates summary indicator scores based on averages of domain scores. The steps are as follows:

- 1. Determine if the summary indicator score can be calculated. To calculate the summary indicator score, CMS uses the *half-scale rule* to determine if at least half (>50%) of the associated domains have a valid score. If the summary indicator score cannot be calculated, it will not receive a score (i.e., receives an invalid result of CSR-I).
- **2.** Calculate the summary indicator score. If the summary indicator score can be calculated, CMS averages the available domain scores. An example using mock data is shown in Exhibit 30.

Name	Type of QRS Component	Score
Clinical Effectiveness	Domain	71.1757
Patient Safety	Domain	99.6516
Prevention	Domain	83.6211
Clinical Quality Management	Summary Indicator	84.8161 (Average of available domain scores)

Exhibit 30. Example Summary Indicator Score Calculation

## STEP 7: APPLY EXPLICIT WEIGHTS TO SUMMARY INDICATOR SCORES

CMS applies explicit weights at the summary indicator level when calculating QRS scores and ratings. CMS assigns a weight of 2/3 (66.67%) to the Clinical Quality Management summary indicator, and a weight of 1/6 (16.67%) to the Enrollee Experience and the Plan Efficiency, Affordability, & Management summary indicators. This weighting structure reflects the approximate percentage of measures in each summary indicator. Exhibit 31 includes an example of the application of the explicit weights to the summary indicator scores using mock data.

Name	Type of QRS Component	Unweighted Score	Weight	Weighted Summary Indicator Score
Clinical Quality Management	Summary Indicator	84.8161	* .6667	56.5469
Enrollee Experience	Summary Indicator	59.9472	*.16665	9.9932
Plan Efficiency, Affordability, & Management	Summary Indicator	57.8032	* .16665	9.6358

Exhibit 31. Application of the Explicit Weights to the Summary Indicator Score

## STEP 8: CALCULATE GLOBAL SCORE

CMS calculates the global score based on sum of summary indicator scores. The steps for reporting units with three summary indicator scores are as follows:

**1. Determine if the global score can be calculated.** *CMS calculates the global score for the reporting unit only if the Clinical Quality Management summary indicator has a score and at least one of the other two summary indicators has a score.* If the global score cannot be calculated due to inability to pass this scoring rule, then the reporting unit receives the following invalid code:

- **No Global (NG):** Insufficient data to calculate a global rating.
- **2.** Calculate the global score. If the global score can be calculated according to the scoring rule described above, CMS sums the available weighted summary indicator scores. An example using mock data is shown in Exhibit 32.

Name	Type of QRS Component	Example Weighted Summary Indicator Score
Clinical Quality Management	Summary Indicator	56.5384
Enrollee Experience	Summary Indicator	9.9932
Plan Efficiency, Affordability, & Management	Summary Indicator	9.6358
Global	Global	76.1674 (Sum of available summary indicator scores)

**Exhibit 32. Example Global Score Calculation** 

For reporting units with two summary indicator scores (i.e., Clinical Quality Management and either Enrollee Experience or Plan Efficiency, Affordability, & Management), CMS applies an 80% weight to the Clinical Quality Management summary indicator score and a 20% weight to the other scored summary indicator. 80 CMS then sums the weighted scores to calculate the global score.

## STEP 9: CONVERT SCORES TO RATINGS

CMS converts scores to ratings by following these steps:

1. Identify cut point values. After calculating scores for composites through the global result, CMS uses cluster analysis of scores in combination with the jackknifing procedure (for the global scores only), to create cut points for each composite, domain, summary indicator, and global component. Cut points are numeric values that delineate the 5-star categories. These values are used to convert numeric scores into star ratings for each QRS hierarchy component. There are no cut points for measures; measures are uniformly distributed due to standardization. Therefore, it would be difficult to cluster and assign star ratings.

To identify the cut point values, CMS uses a clustering analysis to take valid scores from each reporting unit and group them together based on distance into five clusters. CMS then conducts a jackknife procedure to calculate QRS cut points using sub-samples of data with one observation removed at a time (i.e., 1st data set has the 1st observation removed, 2nd data set has the 2nd observation removed).

CMS conducts the cluster analysis for each component of the hierarchy from composites through the summary indicator scores (i.e., 23 independent clustering runs). At the global level, CMS conducts the cluster analysis in combination with a jackknife procedure. The

 $^{80}$  In scenarios where a reporting unit has only two valid summary indicator scores, CMS calculates the summary indicator weights by redistributing the weight assigned to the missing summary indicator (i.e., .1667). Because the total weight of the two available summary indicators does not equal 100 (i.e.,  $\sim$ 66.67% +  $\sim$  16.67% = 83.34%), CMS scales up the two valid summary indicators proportional to 83.34%. Thus, the calculation of summary indicator weights in these scenarios is as follows: S1 weight = 0.6667/0.8334 = 0.8000; Other SI weight = 0.1667/0.8334 = 0.2000.

resulting data-driven cut points are different at each level of the hierarchy. Therefore, each QRS hierarchy component has its own set of four cut point values (to create five rating categories). In the QRS Proof Sheet, the cut point values are labeled 1 through 4, (e.g., Cut Point 1, reporting the threshold between 1-star rating and 2-star rating).

Cut points will likely change from year to year due to differences in submitted QRS measure data each year. CMS publishes the cut point values with the QRS scores and ratings in the preview reports and proof sheets during the QRS preview period.

**2. Convert scores to ratings.** CMS converts each component score (for composites, domains, summary indicators, and global score) into a rating using their respective cut points that delineates the rating categories of 1, 2, 3, 4, and 5 stars. Scores fall into one of the five categories created by the cut points.

CMS does not use decimal points when applying cut points (i.e., only the two-digit integer cut point is used when applying a cut point to the score). Ratings are assigned on a 5-star scale and only whole stars (1, 2, 3, 4 or 5) are assigned.

Exhibit 33 shows how a global score is converted to a global rating using mock global score cut points (example cut points of 31, 45, 56, and 69). A reporting unit that received a global score of 67.5222 would receive a 4-star rating as the score lies within the limits of the fourth category ( $56 \le Score < 69$ ).

Example Cut Points	Rating
0 < Score < 31	1 star (★)
31≤ Score < 45	2 stars (★★)
45 ≤ Score < 56	3 stars (★★★)
56 ≤ Score < 69	4 stars (****)
	For example, a global score of 67.5222 would be assigned a 4-star global rating
69 ≤ Score	5 stars (****)

Exhibit 33. Global Rating Calculation with Example Cut Points

## STEP 10: PRODUCE QRS RESULTS FOR PREVIEW AND FINALIZATION

The last step in applying the QRS rating methodology is production of the Ratings Output File (ROF) (for internal CMS use). The ROF contains all the QRS results for all participating reporting units. Using the ROF, CMS produces a QRS Preview Report and QRS Proof Sheet for each reporting unit for QHP issuers to preview the results during the QRS preview period and reports for Exchange administrators, including the Center for Consumer Information and Insurance Oversight (CCIIO), SBE administrators, FFE State contacts.

Please note that CMS does not publish the ROF. Within the HIOS-MQM, States are only granted access to ratings information for QHP issuers operating within their State, and QHP issuers may only access ratings information for their respective reporting units.

## Appendix E. QRS Hierarchy

The QRS measures are organized into a hierarchical structure that serves as a foundation of the QRS rating methodology (the QRS hierarchy). The measures are grouped into hierarchy components (composites, domains, summary indicators) to form a single global rating.<sup>81</sup>

Exhibit 34 illustrates the 2021 QRS hierarchy, which is the organization of measures into composites, domains, and summary indicators and, ultimately, a single global rating. The survey measures in the QRS measure set are noted with an asterisk (\*). Measures not currently endorsed by NQF are noted as <sup>¥</sup>. Measures highlighted in grey are not included in the calculation of 2021 QRS scores and ratings.

Exhibit 34. QRS Hierarchy

QRS Summary Indicator	QRS Domain	QRS Composite	Measure Title (* indicates survey measure)	NQF ID (* indicates not currently endorsed)
<b>Clinical Quality</b>	Clinical	Asthma Care	Asthma Medication Ratio	1800
Management	Effective- ness	Behavioral	Antidepressant Medication Management	0105
	11033	Health	Follow-Up After Hospitalization for Mental Illness (7-Day Follow-Up)	0576
			Initiation and Engagement of Alcohol and Other Drug Dependence Treatment	0004
		Cardiovascular	Controlling High Blood Pressure	0018
		Care	Proportion of Days Covered (RAS Antagonists)	0541
			Proportion of Days Covered (Statins)	0541
		Diabetes Care	Comprehensive Diabetes Care: Eye Exam (Retinal) Performed	0055
			Comprehensive Diabetes Care: Hemoglobin A1c (HbA1c) Control (<8.0%)	0575
			Comprehensive Diabetes Care: Medical Attention for Nephropathy	0062
			Proportion of Days Covered (Diabetes All Class)	0541
	Patient Safety		International Normalized Ratio Monitoring for Individuals on Warfarin	0555
			Annual Monitoring for Persons on Long- term Opioid Therapy	3541
			Plan All-Cause Readmissions	1768¥

70

<sup>&</sup>lt;sup>81</sup> In communicating total measure counts, the totals presented here represent the perspective of the scoring methodology, rather than the perspective of the measure steward. If counting based the perspective of the scoring methodology, there are 39 measures that are collected and used in scoring (rather than 36). The difference of three measures in this count comes from two factors. First, Prenatal and Postpartum Care is split into two distinct measures for the QRS hierarchy: *Timeliness of Prenatal Care* and *Postpartum Care*. Similarly, Proportion of Days Covered (NQF #0541) is split into three distinct measures: *Diabetes All Class, Renin Angiotensin System (RAS) Antagonists*, and *Statins*.

QRS Summary Indicator	QRS Domain	QRS Composite	Measure Title (* indicates survey measure)	NQF ID ( <sup>¥</sup> indicates not currently endorsed)
Clinical Quality	Prevention	Checking for	Breast Cancer Screening	2372
Management (continued)		Cancer	Cervical Cancer Screening	0032
(continued)			Colorectal Cancer Screening	0034
		Maternal Health	Prenatal and Postpartum Care (Postpartum Care)	1517 ¥
			Prenatal and Postpartum Care (Timeliness of Prenatal Care)	1517 ¥
		Staying Healthy	Chlamydia Screening in Women	0033
		Adult	Flu Vaccinations for Adults Ages 18-64*	0039
			Medical Assistance with Smoking and Tobacco Use Cessation*	0027
		Staying Healthy	Annual Dental Visit	1388 ¥
		Child	Childhood Immunization Status (Combination 3)	0038
			Immunizations for Adolescents (Combination 2)	1407
			Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents	0024
			Well-Child Visits in the First 30 Months of Life	1392
			Child and Adolescent Well-Care Visits82	N/A
Enrollee	Access and Care	Access and Care	Access to Care*	0006
Experience	Coordination	J	Care Coordination*	0006
	Doctor and	Doctor and	Rating of All Health Care*	0006
	Care	Care	Rating of Personal Doctor*	0006
			Rating of Specialist*	0006
Plan Efficiency,	Efficiency & Efficient Care	Appropriate Testing for Pharyngitis	0002 ¥	
Affordability, & Affor Management	Affordability	Affordability	Appropriate Treatment for Upper Respiratory Infection	0069
			Avoidance of Antibiotic Treatment for Acute Bronchitis/ Bronchiolitis	0058
			Use of Imaging Studies for Low Back Pain	0052 <sup>¥</sup>
	Plan Service	Enrollee Experience with Health Plan	Access to Information*	0007 ¥
			Plan Administration*	0006
		Tioditi i idii	Rating of Health Plan*	0006

<sup>&</sup>lt;sup>82</sup> CMS is assessing the impact of the changes made by the measure steward (NCQA) to the specifications for the Well-Child Visits in the Third, Fourth, Fifth and Sixth Years of Life measure that was renamed the Child and Adolescent Well-Care Visits measure. As part of the 2021 Call Letter process, CMS may propose to remove the new Child and Adolescent Well-Care Visits measures from 2021 scoring.

## Appendix F. Overview of QHP Enrollee Survey Results

Exhibit 35 provides an overview of different resources through which QHP Enrollee Survey results are communicated to QHP issuers.

Exhibit 35. QHP Issuer Resources for Reviewing QHP Enrollee Survey Results

Resource	Description
QHP Enrollee Survey Quality Improvement Reports (QI	These reports communicate the full results of the QHP Enrollee Survey, including questions not included as part of the QRS measure set. The raw frequencies for all QHP Enrollee Survey questions are included in the QHP Enrollee Survey QI Reports. CMS intends to release the QHP Enrollee Survey QI Reports during the QRS preview period.
Reports)	The results shown in QHP Enrollee Survey QI Reports are produced after data cleaning and scoring procedures. First, the data used for these reports are cleaned according to standard CAHPS® rules. Second, the scores are weighted and case-mix adjusted. Lastly, the scores are calculated using the CAHPS® Analysis Program (CAHPS® Macro) and the full national QHP Enrollee Survey database. This program, along with instructions for using it, are available at no cost at <a href="Instructions for Analyzing Data from CAHPS® Surveys">Instructions for Analyzing Data from CAHPS® Surveys</a> . The QI Reports, available via the MQM, contain additional information about the methodology behind the QHP Enrollee Survey QI Reports.
QRS survey measures (e.g., via QRS preview)	CMS-calculated results for the QRS include survey measures derived from a subset of questions in the QHP Enrollee Survey. The results in the QHP Enrollee Survey QI Reports differ from those reported for QRS survey measures as additional scoring specifications are used to calculate QRS survey measure results. QRS survey measure results are calculated via additional post-survey processing including case-mix adjustment, removal of invalid responses, and including appropriate respondents in the denominator totals.
QHP Enrollee Survey QI Reports Methodology Guide	A PDF file that describes the contents of the QHP Enrollee Survey QI Reports and includes details regarding the survey process and timeline and the methods for analyzing the survey data.
National QI Benchmark Report	The National Quality Improvement Benchmark Report provides national-level statistics for the QHP Enrollee Survey scoring questions, screener questions, about-the-enrollee questions, and survey disposition. QHP issuers can use this report to compare the performance of their respective reporting units to the performance of all reporting units that participated in the QHP Enrollee Survey for the given year.
Raw results provided by the QHP Enrollee Survey vendors upon data submission	The estimates provided by survey vendors are preliminary and are intended to provide QHP issuers with an early estimate of their survey scores. Survey vendors may not perform the same type of data cleaning performed by CMS. Additionally, survey vendors are unable to implement the identical case-mix adjustment that is performed by CMS because they do not have access to the full national dataset. A survey vendor may analyze the survey data in order to provide QHP issuers with aggregated results and may conduct additional analyses. These survey vendor analyses are not official survey results and should only be used for quality improvement purposes.

Detailed below is additional information regarding differences between QHP Enrollee Survey results communicated via the QHP Enrollee Survey QI Reports and QRS results communicated via the QRS Proof Sheet.

QHP Enrollee Survey Composite versus QRS Survey Measure Construction: Historically, the CAHPS® program has used the term "composite" to refer to a construct that is derived from more than one survey question. The QHP Enrollee Survey QI Reports use the term composite in the same context as other CAHPS® surveys (e.g., Getting Needed Care and Getting Care Quickly). However, for the QRS, the term composite refers to a grouping of measures; it is the first level of summary results in the QRS hierarchy. For example, the Enrollee Experience with

Health Plan composite in the QRS includes the scores for three QRS measures: Access to Information, Plan Administration, and Rating of Health Plan.

The questions included in QRS survey *measures* may be different than the questions included in "*composites*" shown in the QHP Enrollee Survey QI Reports. For example, the *Access to Care* measure is composed of four questions, while in the QHP Enrollee Survey QI Reports these four questions make up two separate composites: Getting Care Quickly and Getting Needed Care.

**Denominator Size Calculation:** There is a difference in how the denominator size is calculated and communicated in the QHP Enrollee Survey QI Reports versus the QRS Proof Sheets. QHP Enrollee Survey QI Reports include raw survey frequencies, meaning that the denominator size reported for measures are equal to the total number of eligible respondents who answered the question. For the QRS, CMS calculates survey measures from survey questions using specific QRS scoring specifications. For the QRS, the total denominator size for QRS survey measures reflects the total number of respondents who have a non-missing value for at least one of the questions within the measure.

For example, the QRS measure *Care Coordination* is identical to the QHP Enrollee Survey QI Report composite Care Coordination. With 75 responses, the result for the Care Coordination composite would appear on the QI Reports, but a *Care Coordination* measure score would not appear in the QRS Proof Sheet as the score was not calculated due to an insufficient denominator size (<100). These differences stem from the different goals of the two products. The QRS is designed to generate results for public reporting and, therefore, has higher requirements associated with whether a measure can be reported, while the QHP Enrollee Survey QI Reports are currently designed as a tool to be used for quality improvements undertaken by the QHP issuer.

**Communicating Relative Performance:** QRS measure data are standardized across all reporting units. Therefore, if a majority of eligible reporting units submit very high measure raw values, a single eligible reporting unit may submit a high raw value for a given measure, but may still receive a low standardized score for the measure because many other reporting units performed even better.

The QHP Enrollee Survey QI Reports use a different approach to convey relative performance. This approach is based on a pair-wise t-test with an alpha of 0.05. Additional information can be found in the CAHPS® Macro materials in *Instructions for Analyzing Data from CAHPS® Surveys*.

Due to these different approaches, there are instances when an eligible reporting unit could score average or above average on QHP Enrollee Survey items in the QI Reports and receive 1-star or 2-star ratings for certain QRS components.

## **Appendix G. Glossary and List of Acronyms**

Exhibit 36 includes definitions for key terms used in this document.

Exhibit 36. Glossary

Term	Definition
Administrative data collection method	Method of data collection that obtains data from administrative sources (e.g., claims data) to help identify a measure's eligible population and numerator compliance.
Average	A single value obtained by adding several quantities together and then dividing this total by the number of quantities.
Benefit Not Offered (NB)	Data validation result assigned for a measure if the QHP issuer did not offer the health benefit required by the measure.
Biased Rate (BR)	Data validation result assigned for a measure if the QHP issuer's calculated rate was materially biased.
Call Letter for the Quality Rating System (QRS) and Qualified Health Plan (QHP) Enrollee Experience Survey (referred to as the QRS and QHP Enrollee Survey Call Letter)	The annual QRS and QHP Enrollee Survey Call Letters serve to communicate changes and request comments on the Centers for Medicare & Medicaid Services' (CMS') proposed refinements to the QRS and QHP Enrollee Survey programs.
Component	The QRS hierarchy includes the following components, listed from the lowest to the highest level of the hierarchy: composites, domains, summary indicators, and global. These components represent levels of scores and ratings. Scores for a component are composed of averages of scores of components in the lower level of the hierarchy. Thus, the summary indicator scores are averages of associated domain scores, and domain scores are averages of associated composite scores. The global score is the sum of weighted summary indicator scores.
Composite	A component of the QRS hierarchy. A score for this component is created by a combination of two or more measures. A composite may also consist of a QRS survey measure that is comprised of multiple survey questions (e.g., Access to Care measure forms the Access to Care composite). An exception to the definition relates to the Asthma Care composite. This composite currently consists of one measure; however, it is considered a composite for purposes of scoring higher level components.
Cut point	A numeric score value that serves as a threshold to delineate a category, or level of performance, for each component. These levels of performance produce the 5-star rating scale. Cut points are calculated as the average between two adjacent star rating clusters – the maximum score in the lower star rating cluster and the minimum score in the higher star rating cluster. At the global level, jackknifing is used to improve robustness of the global cut points within a given year.
Data validation	A process by which an independent third party validates a QHP issuer's QRS measure data, including their data systems and processes. The data validator will verify completeness, accuracy, and comparability of the measure results. For 2020, CMS requires QHP issuers to contract with a HEDIS® Compliance Organization (National Committee for Quality Assurance [NCQA]-licensed). A HEDIS® Compliance Auditor, employed or contracted by that organization, will validate all QRS clinical measure results and the sample frame for the QHP Enrollee Survey using the HEDIS® Compliance Audit standards, policies, and procedures.

Term	Definition
Data validator	An independent third party that validates the QRS clinical measure data and the sample frame for the QHP Enrollee Survey prior to data submission. QHP issuers must contract with a HEDIS® Compliance Auditor, who will serve as the data validator.
Direct Enrollment Entity	An entity that an Exchange permits to assist consumers with direct enrollment in qualified health plans offered through the Exchange.
Discontinued	The QHPs in the reporting unit will not be offered (i.e., not offering to new members and/or not available for purchase during the upcoming open enrollment period) through an Exchange and will not be operational.
Domain	A component of the QRS hierarchy. A score for this component is created by averaging scores from associated composites.
Exclusive Provider Organization (EPO)	A type of health insurance product that usually limits coverage to care from providers, or groups of providers, who have contracts with the health insurance issuer to be part of a network of participating providers. EPO enrollees will generally not be reimbursed or receive benefits for out-of-network services; however, some EPOs will provide partial reimbursement for emergency situations.
Federally-facilitated Exchange (FFE)	The Exchange model operated by HHS for individual and small group market coverage. For QHP issuers operating in the FFEs, CMS will display QHP quality rating information on HealthCare.gov alongside other QHP information to inform consumers.
FFEs where the State performs plan management functions	A type of FFE in which a State operates plan management functions, while the remaining Exchange functions are operated by HHS. For QHP issuers operating in States performing plan management functions in the FFEs, CMS will display QHP quality rating information on HealthCare.gov.
Global	A component of the QRS hierarchy. A score or rating for this component is created by summing the summary indicator scores (e.g., a weight of 2/3 (66.67%) to the Clinical Quality Management summary indicator, and a weight of 1/6 (16.67%) to the Enrollee Experience and the Plan Efficiency, Affordability, & Management summary indicators).
Half-scale rule	A scoring rule that requires at least half of the component scores that form a higher-level component score to be present in order for the component score to be calculated. For example, at least half of the composite scores must be present in order to calculate the domain score. This rule is intended for component scores to be comparable across reporting units.
Health Insurance Exchange (Exchange)	A service in each State where qualified individuals, families, and small businesses can learn about their health insurance options; compare QHPs based on quality, costs, benefits, and other important features; choose a QHP; and enroll in coverage. In some States, the Exchange is operated by the State. In others, it is operated by the federal government.
Health Maintenance Organization (HMO)	A type of health insurance product that usually limits coverage to care from providers who work for or contract with the HMO and generally will not cover out-of-network care except in an emergency. In this type of organization, enrollees must obtain all services from affiliated practitioners and must usually comply with a predefined authorization system to receive reimbursement.
HealthCare.gov	The consumer-facing website developed and operated by CMS that provides eligibility information, enrollment instructions, and QHP information for consumers looking to enroll in a health insurance plan through the FFEs. QRS ratings for QHP issuers operating in the FFEs, including States performing plan management functions, and SBE-FPs will be displayed on HealthCare.gov to support consumers as they search for and enroll in a QHP.

Term	Definition
Healthcare Effectiveness Data and Information Set (HEDIS®) Compliance Audit <sup>TM</sup>	The HEDIS® Compliance Audit is a data validation process that consists of a standardized review of an organization's data management processes and algorithmic compliance with measure technical specifications. This process verifies the integrity of QRS measure data and allows for comparability across organizations. An overview of the HEDIS® Compliance Audit, the list of NCQA-Certified HEDIS® Compliance Auditors, and a link to the HEDIS® Compliance Audit: Standards, Policies, and Procedures, which is available for purchase and can be accessed at the following link: http://store.ncqa.org/index.php/performance-measurement.html.
HEDIS® Compliance Auditor	An individual certified by the National Committee for Quality Assurance (NCQA) to validate QRS clinical measure data and the QHP Enrollee Survey sample frame using the standardized HEDIS® Compliance Audit program.
Hybrid data collection method	Uses data obtained from both administrative and medical record/ electronic medical record sources to identify the eligible population and numerator compliance. The denominator consists of a systematic sample of enrollees drawn from the measure's eligible population. QHP issuers then: a) review administrative data to determine numerator compliance, and b) review medical record data for enrollees who do not meet numerator criteria based on administrative data, in order to identify additional numerator compliance for the measure. Details on the collection method are included in a measure's technical specifications (see the <i>Quality Rating System Measure Technical Specifications</i> ).
Indicator	A rate that forms a measure. Some QRS measures have multiple indicators or additional sub-levels (i.e., below sub-measure indicators and sub-measure indicators).
Interactive Data Submission System (IDSS)	The web-based system, owned and managed by the National Committee for Quality Assurance (NCQA), which QHP issuers will use to submit QRS clinical measure data.
Meaningful Measures Initiative	A CMS framework which identifies the highest priorities for quality measurement and improvement. The framework involves only assessing those core issues that are the most critical to providing high-quality care and improving individual outcomes. The Meaningful Measure Areas serve as the connectors between CMS strategic goals and individual measures/initiatives that demonstrate how high-quality outcomes are being achieved. Meaningful Measures Areas are concrete quality topics, which reflect core issues that are most vital to high quality care and better patient outcomes.
Measure	Rate variables that serve as the fundamental building blocks of the QRS hierarchy. Each measure is assigned to a composite and contributes to the scoring for the higher components of the hierarchy (i.e., domains, summary indicators, and global).
Measurement Year	The measurement year refers to the year reflected in the data. All measure data are retrospective. The exact period of time represented by the measure is dependent on the technical specifications of that measure.
National Committee for Quality Assurance (NCQA)	NCQA developed and maintains the system through which QHP issuers will submit validated QRS clinical measure data to CMS, the Interactive Data Submission System (IDSS). NCQA is the measure steward for HEDIS® measures. NCQA also manages the HEDIS® Compliance Audit program.
National Quality Forum (NQF)	NQF reviews, endorses, and recommends use of standardized healthcare performance measures. NQF issues an endorsement identification number (ID) for measures that they endorse. This ID is cited for QRS measures where applicable.
Not Applicable (NA)	Data validation result assigned for a measure if the QHP issuer followed the specifications but the denominator was too small (i.e., less than 30) to report a valid rate. The QHP issuer did not have sufficient data to fulfill the continuous enrollment criteria for the measure.
Not Calculated (NC)	Invalid code assigned to measures with an insufficient denominator size.
No Global (NG)	Invalid code assigned to reporting units with insufficient data to calculate a global rating.
Not Reported (NR)	Data validation result assigned for a measure if the QHP issuer chose not to report the measure rate.

Term	Definition
Not Operational	The QHPs in the reporting unit are not sold on an Exchange (SHOP or individual), are not accepting new members or groups, and do not have active or existing members (i.e., zero members).
Operational	The QHPs in the reporting unit are available for purchase on an Exchange (SHOP or individual), accepting new members or groups, and/or have active or existing members.
Pharmacy Quality Alliance (PQA)	The measure steward for the <i>Proportion of Days Covered</i> (PDC) measure, the Annual Monitoring for Persons on Long-Term Opioid Therapy (AMO) measure, and the International Normalized Ratio (INR) Monitoring for Individuals on Warfarin measure.
Point of Service (POS)	A type of health insurance product modeled after an HMO, but with an opt-out option. In this type of product, enrollees may choose to receive services either within the organization's health care system (e.g., an in-network practitioner) or outside the organization's health care delivery system (e.g., an out-of-network practitioner). The level of benefits or reimbursement is generally determined by whether the enrollee uses in-network or out-of-network services.
Preferred Provider Organization (PPO)	A type of health insurance product that usually limits coverage to care from providers, or groups of providers, who have contracts with the health insurance issuer to be part of a network of participating providers. PPO enrollees may use providers outside of this network, but out-of-network services are usually covered at a reduced rate (e.g., reduced reimbursement percentages, higher deductibles, higher co-payments).
Product type	A discrete package of health insurance coverage benefits that a health insurance issuer offers using a particular product network type (for example, health maintenance organization [HMO], preferred provider organization [PPO], exclusive provider organization [EPO], point of service [POS]) within a service area. This term refers to a specific contract of covered benefits, rather than a specific level of cost-sharing imposed.
Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021	A document published on the MQI website that includes detailed specifications and protocols for HHS-approved survey vendors to conduct the QHP Enrollee Survey.
QHP Enrollee Survey score	The average value for a measure from the QHP Enrollee Survey calculated for survey respondents in a given reporting unit. A survey score can be for a single assessment question or a combination of several questions on a similar topic that are combined to form a single measure.
QHP Enrollee Survey vendor	An HHS-approved survey vendor with which a QHP issuer contracts to administer the QHP Enrollee Survey to a sample of the QHP issuer's enrollees and that is authorized to submit the survey response data on the QHP issuer's behalf.
QRS clinical measures	QRS measures calculated using clinical data from a QHP issuer's administrative and medical record sources.
QRS hierarchy	The organization of the QRS measures into information categories ranging from the most granular information (measure scores) to a global rating.
QRS rating methodology	The rules for combining measures and converting scores into quality ratings for the QRS.
QRS survey measures	QRS measures calculated using enrollee responses to a subset of specified questions in the QHP Enrollee Survey. For a crosswalk that maps each QRS survey measure to the relevant QHP Enrollee Survey item(s), refer to Appendix C of this Guidance.
Qualified Health Plan (QHP)	A health insurance plan that has in effect a certification that it meets the standards established by the Patient Protection and Affordable Care Act and supporting regulations, issued or recognized by each Exchange through which such plan is offered.

Term	Definition
Qualified Health Plan Enrollee Experience Survey (QHP Enrollee Survey)	A survey tool developed, as directed by the Patient Protection and Affordable Care Act section 1311 (c)(4), that includes a comprehensive set of questions related to enrollee experience with their QHP offered through the Exchange. CMS will use enrollee response data for a specified subset of the questions to calculate the QRS survey measures.
Qualified Health Plan (QHP) issuer	A health insurance issuer that offers a QHP in accordance with a certification from an Exchange, as defined by 45 C.F.R. § 155.20. Each QHP issuer participating in an Exchange is defined by a separate federal Health Insurance Oversight (HIOS) Issuer ID. Each QHP issuer is defined by a State geographic unit.
2021 Quality Rating System Measure Technical Specifications	A document published on the CMS Health Insurance Marketplace® Quality Initiatives website (http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Health-Insurance-Marketplace-Quality-Initiatives.html) that includes detailed measure specifications and general guidelines for QRS measure data collection.
QHP Enrollee Survey sample frame	A text file containing data elements for all survey-eligible enrollees for each reporting unit required to field the survey from which vendors draw the QHP Enrollee Survey sample. QHP issuers must populate a complete, accurate, and valid sample frame of all survey-eligible enrollees for each reporting unit required to field the survey.
QHP quality rating information	Information that includes QRS scores and ratings, as well as QHP Enrollee Survey results.
Quality Rating System (QRS)	As directed by the Patient Protection and Affordable Care Act section 1311 (c)(3), the QRS is a system of rating QHPs offered through the Exchange based on quality and price. The QHP quality rating information will be provided to individuals and employers to inform their selection of a QHP and will provide a system for monitoring of QHP quality by regulators.
QRS rating	Also referred to as "categorical rating" or "star rating." A discrete value based on a score for QRS components (composites, domains, summary indicators, and global), which facilitates consumer understanding of QHP performance.
QRS score	A numerical value that indicates the level of QHP performance for QRS measures and hierarchy components (composites, domains, summary indicators, and global). For component scores, composite scores are averages of standardized measure scores for a QHP; domain scores are averages of associated composite scores for a QHP; summary indicator scores are averages of associated domain scores for a QHP; and the global score is the sum of the weighted summary indicator scores for a QHP.
Ratings year	The ratings year refers to the year the data are collected (including fielding of the QHP Enrollee Survey), validated, submitted, and ratings are calculated.
Reference group	A population of reporting units that is defined based on specification of a geographical region and/or time period. A reporting unit's level of performance is relative to the average performance of the national all-product reference group.
Reporting unit	The unit by which a QHP issuer groups their enrollees for purposes of QRS and QHP Enrollee Survey measure data collection and submission. The reporting unit for the QRS and QHP Enrollee Survey is defined by the unique State-product type for each QHP issuer.
Standardized measure score	A value ranging from 0 to 100 that results from independently transforming all raw measure rates using z-score standardization. Measure rate values of each reporting unit are compared to the mean measure rate using a national reference group (i.e., across all eligible reporting units), and spread is controlled using the standard deviation. Standardizing the measure scores allows for comparisons of a reporting unit relative to all other reporting units. Only QRS measure scores are standardized; component scores are not standardized.

Term	Definition
State-based Exchange (SBE)	An Exchange model in which a State operates its own Health Insurance Exchange, for both the individual and small group markets. An SBE is responsible for certifying QHP issuers, overseeing QHP issuer compliance with federal Exchange quality standards as a condition of certification, and displaying QHP quality rating information to help consumers compare QHPs.
State-based Exchange on the Federal Platform (SBE-FP)	An Exchange model in which a State operates its own Health Insurance Exchange, for both the individual and small group markets but relies on the federal platform to perform certain eligibility and enrollment functions. An SBE-FP is responsible for certifying issuers, overseeing issuer compliance with federal Exchange quality standards as a condition of certification. For QHP issuers operating in SBE-FPs, CMS/CCIIO will display QHP quality rating information on HealthCare.gov.
Summary indicator	A component of the QRS hierarchy. A score for this component is created by averaging scores from associated domains.
Summary-level measure data	The level of QRS clinical measure data that QHP issuers will submit to CMS for each eligible reporting unit. Summary-level data elements are specified for each QRS clinical measure in the 2021 Quality Rating System Measure Technical Specifications, and include elements like eligible population (denominator), numerator, and the rate.
Survey sample frame	The QHP issuer's eligible population source file that contains a list of the eligible enrollees for which the QHP Enrollee Survey can be administered. The data validator will validate the survey sample frame, and the HHS-approved QHP Enrollee Survey vendor will generate an enrollee sample based on the validated sample frame.
Weighted average	An average that is calculated in which some data points (values) contribute more than others to the final average.

Exhibit 37 provides definitions for acronyms that appear in this 2021 Guidance.

Exhibit 37. List of Acronyms

Acronym	Definition
ACE	Angiotensin Converting Enzyme
AHRQ	Agency for Healthcare Research and Quality
AOD	Alcohol and Other Drug
API	Application Program Interface
ARB	Angiotensin Receptor Blockers
ВМІ	Body Mass Index
BR	Biased Rate
C&M	Continuation and Maintenance
CAHPS®	Consumer Assessment of Healthcare Providers and Systems
CCIIO	Center for Consumer Information and Insurance Oversight
CSR-I	Insufficient data to calculate a score according to the QRS rating methodology.
CSR-NS	Component Score or Rating – Not Scored
CMS	Center for Medicare & Medicaid Services
DE	Direct Enrollment
EPO	Exclusive Provider Organization
FFE	Federally-facilitated Exchange

Acronym	Definition
HEDIS®	Healthcare Effectiveness Data and Information Set
HHS	Department of Health & Human Services
HIOS-MQM	Health Insurance Oversight System-Marketplace Quality Module
HIPAA	Health Insurance Portability and Accountability Act of 1996
НМО	Health Maintenance Organization
HOQ	Healthcare Organization Questionnaire
HPV	Human Papillomavirus
HTN	Diagnosis of Hypertension
IDSS	Interactive Data Submission System
IFP	Individual and Family Plan
IHS	Index Hospital Stays
MMR	Measles, Mumps and Rubella
MN-S	Measure – Not Scored
MQI	Marketplace Quality Initiatives
MSD	Marketplace Service Desk
NA	Not Applicable
NB	Benefit Not Offered
NC	Not Calculated
NCQA	National Committee for Quality Assurance
NG	No Global
NQF	National Quality Forum
NQS	National Quality Strategy
NR	Not Reported
OB/GYN	Obstetrician/Gynecologist
ОРМ	Office of Personnel Management
PCP	Primary Care Physician
PCV	Pneumococcal Conjugate Vaccines
PDC	Proportion of Days Covered
POS	Point of Service
PPO	Preferred Provider Organization
PQA	Pharmacy Quality Alliance
QHP	Qualified Health Plan
QI	Quality Improvement
QIS	Quality Improvement Strategy
QRS	Quality Rating System
RAS	Renin Angiotensin System

Acronym	Definition						
REGTAP	Registration for Technical Assistance Portal						
SBE	State-based Exchange						
SBE-FP	State-based Exchange on the Federal Platform						
SERVIS	State Exchange Resource Virtual Information System						
SHOP	Small Business Health Options Program						
URI	Upper Respiratory Infection						
VZV	Varicella Zoster Virus						

# Appendix H. Sample Frame Layout for 2021 QHP Enrollee Survey

#### **Changes to Sample Frame Layout**

Removed the completeness thresholds and reduced the field position length from two to one for the following variables:

- Enrollee Education
- Enrollee Employment

An individual sample frame must be generated for each Reporting Unit required to administer the 2021 QHP Enrollee Survey (i.e., multiple Reporting Units cannot be combined into a single file) and must include a single record for each enrollee that meets the eligibility requirements outlined in the *Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021*. The sample frame must be specific to a given Reporting Unit (unique State-product type for each QHP issuer) and must *not* be combined with other product lines or products. The required data elements described in Exhibit 38 must be included for each enrollee included in the sample frame.

QHP issuers must attempt to fully populate all sample frame variables.<sup>83</sup> The QHP Project Team has included completeness thresholds (i.e., not missing) for each variable in the sample frame. Field population for all variables is required, not optional, and QHP issuers should meet these minimum completeness thresholds.

Select variables **must** be populated for every record in the file (0% bias variables). These variables must meet logic agreements for each record in the sample frame. For example, the Product Type must be the same for all records in the sample frame file layout. Discrepancies in these variables can be indicative of a potential sampling error. The 0% bias variables for 2021 survey administration include the following:

- Product Type
- Issuer ID
- OHP State
- Reporting Unit ID
- Reporting Status
- Total Enrollment

Specific information about each variable is included in **Exhibit 38. 2021 QHP Enrollee Survey Sample Frame Data Elements.** 

Select variables in the sample frame may be used for case mix adjustment for sampled enrollees when scoring survey results. Incomplete data for a given reporting unit could decrease the amount of data available for case mix adjustment, which may impact scoring precision for both the QHP Enrollee Survey QI Report scores and the scored survey measures included in the Quality Rating System. QHP issuers are expected to provide data based upon

<sup>&</sup>lt;sup>83</sup> The Centers for Medicare & Medicaid Services (CMS) may conduct targeted compliance reviews under 45 CFR 156.715 to examine QHP issuer compliance with the federal data submission and reporting requirements for the QRS and QHP Enrollee Survey subsequent to the data validation of QRS clinical measures.

completeness thresholds provided in the sample fame layout below. A QHP issuer's submission of the locked and audited sample frame file to their vendor constitutes the QHP issuer's attestation to the accuracy, completeness, and quality of data in the sample frame. Sample frame files not meeting completeness thresholds may be subject to resubmission by the QHP issuer until the completeness thresholds are met. Recommended quality control checks for the sample frame are available in the Create Sample Frame and Draw Sample (Sampling) section of the *Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021*.

In the rare instances in which required enrollee data are missing, QHP issuers must denote these data elements with the valid value for *Missing*. QHP issuers may not append any additional data fields to the sample frame that are not specified in the sample frame file layout. All entries must be left justified. The sample frame includes personally identifiable information; therefore, all vendors and QHP issuers must safeguard sample frame data in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the security requirements outlined in the *Qualified Health Plan Enrollee Experience Survey: Technical Specifications for 2021*.

Exhibit 38. 2021 QHP Enrollee Survey Sample Frame Data Elements

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
QHP Issuer Legal Name	Char	60	1	60	Legal name of the issuer of the QHP in which the individual is enrolled, specific to the state in which the QHP is operating.	Note: This variable MUST be identical for all enrollees included in the sample frame and MUST not be blank.  Note: Do NOT use acronyms or abbreviations. Do NOT include extra spaces or parentheses. Do NOT include superscript characters or trademark symbols.  Note: This variable is used in the QI Reports. Please confirm QHP Issuer Legal Name is spelled correctly.	100%
Product Line	Num	1	61	61		3 = Exchange  Note: A valid value is required for every enrollee in the record. Only "3" is valid for the QHP Enrollee Survey.	100%

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<sup>&</sup>lt;sup>84</sup> Accuracy, completeness, and data quality are required by CMS. Inaccurate data may affect scoring for both the QHP QI Reports and the QHP survey measures included in the QRS.

<sup>&</sup>lt;sup>85</sup> Completeness thresholds are the recommended percentage of records with populated data (i.e., not missing) within a sample frame. QHP issuers are expected to meet these completeness threshold requirements or be able to justify any missing information, if requested.

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Product Type	Num	1	62	62	Name of the product type under which the enrollee's QHP falls.	1 = Health Maintenance Organization (HMO) 2 = Point of Service (POS) 3 = Preferred Provider Organization (PPO) 4 = Exclusive Provider Organization (EPO) Note: A valid value is required for every enrollee in the record. QHP issuers may NOT combine product types. This variable MUST be identical for all enrollees included in the sample frame. Note: This variable MUST match the reported 3-character product type in the Reporting Unit ID variable. For example: Reporting Unit ID = 12345-TX-PPO; then all Product Type = PPO. Note: This variable MUST not be missing (0% bias variable).	100%
Subscriber ID	Char	25	63	87	Subscriber or family ID number, which is the common ID for the subscriber and all dependents. Each issuer can decide the format used for this ID.		100%
Enrollee Unique ID	Char	25	88	112	Unique enrollee ID. This ID differentiates between individuals when family members share the Subscriber ID. Each issuer can decide the format used for this ID, given it uniquely identifies the enrollee and can be linked back to the issuer's records.		100%
Enrollee First Name	Char	25	113	137	Enrollee first name		100%

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Enrollee Middle Initial	Char	1	138	138	Enrollee middle initial		
Enrollee Last Name	Char	25	139	163	Enrollee last name		100%
Enrollee Gender	Num	1	164	164		1 = Male 2 = Female 9 = Missing/Not Available <b>Note:</b> A valid value is required for every enrollee in the record.	90% 10% = 9
Enrollee Date of Birth	Num	8	165	172		MMDDYYYY	100%
Enrollee Mailing Address 1	Char	50	173	222	Street address or post office box		100%
Enrollee Mailing Address 2	Char	50	223	272	Mailing address, 2nd line (if needed)		
Enrollee City	Char	30	273	302			100%
Enrollee State	Char	2	303	304	2-character Postal Service state abbreviation		100%
Enrollee Zip Code	Num	5	305	309	5-digit number		100%
Enrollee Phone 1	Num	10	310	319	3-digit area code plus 7-digit phone number; No separators or delimiters		100%
Flu Flag	Num	1	320	320	Flu Vaccinations for Adults Ages 18-64 Eligibility Flag coded based on enrollee's age as of July 1, 2020.	1 = Eligible (the member was born on or between July 2, 1955, and July 1, 2002) 2 = Ineligible (the member was born before July 2, 1954, or after July 1, 2001) <b>Note:</b> A valid value is required for every enrollee in the record.	100%

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Enrollee Age	Num	2	321	322	Enrollee age as of December 31, 2020.	Numeric, 2-digit variable. For enrollees age 80 years and older, code as 80. For example, an enrollee who is 89 years of age as of December 31, 2020, will be coded 80.  Note: A valid value is required for every enrollee in the record.	100%
Enrollee Education	Num	1	323	323	The highest grade or level of school that the enrollee has completed.	1 = 8th grade or less 2 = Some high school, but did not graduate 3 = High school graduate or GED 4 = Some college or 2-year degree 5 = 4-year college graduate 6 = More than 4-year college degree 9 = Missing Note: A valid value is required for every enrollee in the record.	
Enrollee Employment	Num	1	324	324	Best description of enrollee's employment status.	1 = Employed full-time 2 = Employed part-time 3 = Homemaker 4 = Full-time student 5 = Retired 6 = Unable to work for health reasons 7 = Unemployed 8 = Other 9 = Missing Note: A valid value is required for every enrollee in the record.	

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Issuer ID	Num	5	325	329	Unique HIOS issuer ID number.	Note: A valid value is required for every enrollee in the record. This variable MUST be identical for all enrollees included in the sample frame.  Note: This variable MUST match the reported 5-digit Issuer ID in the Reporting Unit ID variable. For example: Reporting Unit ID = 12345-TX-PPO; then all Issuer ID = 12345.  Note: This variable MUST not be missing (0% bias variable).	100%
QHP State	Char	2	330	331	State associated with the QHP issuer. This variable is different than Enrollee State.	2-character Postal Service state abbreviation.  Note: A valid value is required for every enrollee in the record. This variable MUST be identical for all enrollees included in the sample frame.  Note: This variable MUST match the reported 2-character QHP state postal code in the Reporting Unit ID variable. For example: Reporting Unit ID = 12345-TX-PPO; then all Issuer ID = 12345.  Note: This variable MUST not be missing (0% bias variable).	100%

Variable	Туре	Field	Field	Field	Description	Valid Values	Completeness
		Position Length	Position Start	Position End			Threshold <sup>85</sup>
Reporting Unit ID	Char	12	332	343	Reporting Unit ID. It is made up of the following parts (with a hyphen separating each part): 5-digit Issuer ID, 2-character QHP State postal code, and 3-character Product Type.	5-digit Issuer ID=Issuer ID variable. 2-character QHP state postal code=QHP State variable. 3-character product type=Product Type (HMO, POS, PPO, EPO) variable. For example: 12345-TX-PPO.  Note: A valid value is required for every enrollee in the record. This variable MUST be identical for all enrollees included in the sample frame and the components of this variable MUST match the reported values for the Issuer ID, QHP State, and Product Type variables. For example: Reporting Unit ID = 12345-TX-PPO; then all 5-digit Issuer ID elsauer ID variable = 12345; all 2-character QHP state postal code = QHP State variable = TX; all 3-character product type = Product Type variable = PPO.  Note: This Reporting Unit ID MUST be listed as it appears in the "Reporting Units Required to Submit 2021 QRS Clinical Measure Data and QHP Enrollee Survey Response Data" in the 2021 QHP Enrollee Survey Response Data" in the 2021 QHP Enrollee Survey Response Data" in the 2021 QHP Enrollee Survey: Operational Instructions, which will be made available in the fall of 2020.  Note: This variable MUST not be missing (0% bias variable).	100%

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Metal Level	Num	1	344	344	Metal level associated with enrollee's QHP.	1 = Platinum 2 = Gold 3 = Silver 4 = Bronze 5 = Catastrophic 6 = Bronze Expanded 9 = Missing Note: A valid value is required for every enrollee in the record.	100%

Variable	Туре	Field	Field	Field	Description	Valid Values	Completeness
		Position Length	Position Start	Position End			Threshold <sup>85</sup>
Variant ID	Char	2	345	346	Variant ID associated with enrollee's QHP. Variant IDs 02 and 03 are for federally-recognized tribes and eligible Alaska Natives with incomes above 300% of the federal poverty line. The Variant IDs associated with Medicaid Expansion Enrollees (31-36) are determined based on the actuarial value; issuers should have the Variant IDs assigned to their enrollees and plans. Note: Variant IDs relate to the plan's cost-sharing structure.	01 = Exchange variant (No CSR)  02 = Zero Cost Sharing Plan Variation  03 = Limited Cost Sharing Plan Variation  04 = 73% Actuarial Value (AV) Level Silver Plan CSR  05 = 87% AV Level Silver Plan CSR  06 = 94% AV Level Silver Plan CSR  31 = Medicaid Expansion  32 = Medicaid Expansion  33 = Medicaid Expansion  34 = Medicaid Expansion  35 = Medicaid Expansion  36 = Medicaid Expansion  30 = Missing  Note: A valid value is required for every enrollee in the record. Only the Variant IDs listed above can be included in the sample frame. Do NOT include enrollees in QHPs offered outside the Exchange (off-Exchange health plans) or in non-QHPs, designated by HIOS Variant ID 00.  Note: Variant IDs of 09 = Missing remain in the sample frame. The enrollee is assumed to be eligible (in an on-Exchange health plan) unless there is evidence to suggest otherwise.	100%

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Spoken Language Preference	Num	1	347	347	Enrollee's preferred spoken language.	1 = English 2 = Spanish 3 = Chinese 4 = Other 9 = Missing Note: A valid value is required for every enrollee in the record.	50% 50% = 9
Written Language Preference	Num	1	348	348	Enrollee's preferred written language.	1 = English 2 = Spanish 3 = Chinese 4 = Other 9 = Missing Note: A valid value is required for every enrollee in the record.	50% 50% = 9
APTC Eligibility Flag	Num	1	349	349	Indicates whether enrollee qualified for an advance premium tax credit (APTC), with or without a cost-sharing reduction.	1 = Yes 2 = No 9 = Missing <b>Note:</b> A valid value is required for every enrollee in the record.	70% 30% = 9
Plan Marketing Name	Char	250	350	599	The common name of the QHP in which the individual is enrolled (e.g., the name a consumer would see on an Exchange website when enrolling or on a bill).	If Missing, use "Unavailable."	50% 50% = "Unavailable"
Medicaid Expansion QHP Enrollee	Num	1	600	600	QHPs operating in states with a Section 1115 waiver as part of the Medicaid Expansion MUST include all QHP enrollees and indicate as whether they are enrolled via an 1115 waiver. It is the responsibility of the QHP to know whether their Reporting Units contain such persons.	1 = Yes 2 = No 3 = Missing 9 = Not Applicable, (State Does Not Have a Medicaid 1115 Waiver) Note: A valid value is required for every enrollee in the record. Note: Organizations with Medicaid Expansion QHP enrollees (1=Yes) should have Variant ID values between -31 and -36. Note: QHPs operating in states without Section 1115 waivers use 9 = Not Applicable.	100%

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Reporting	Num	1	601	601	This variable is an identifier to determine whether a particular Reporting Unit is eligible for reporting as part of the Quality Rating System. Only plans that began offering coverage within a state's Exchange in Plan Year 2018 or before are eligible for scoring. This variable is based on the plan year the QHP issuer began offering the Reporting Unit within the state's Exchange. Please refer to the Create Sample Frame and Draw Sample (Sampling) section of the 2021 QHP Enrollee Survey Technical Specifications for more information.	1 = Issuer began offering this product type within state's Exchange in Plan Year 2018 or before 2 = Issuer began offering this product type within state's Exchange in Plan Year 2019 or 2020 9 = Missing  Note: A valid value is required for every enrollee in the record.  Note: This variable MUST not be missing (0% bias variable).  Note: Only plans that began coverage within a state's Exchange in Plan Year 2018 or before are eligible for scoring.	100%
Enrollee Email Address	Char	320	602	921	Email address.	Maximum of 64 characters for the user name, 1 character for the @, and 255 characters for the domain name.  Note: A valid value is required for every enrollee in the record. If not available, leave blank. Enrollee email addresses are necessary for internet survey administration.	80% 20% = blank
Enrollee Phone 2	Num	10	922	931	3-digit area code plus 7-digit phone number; No separators or delimiters	Note: A valid value is required for every enrollee in the record. If not available, leave blank.	

Variable	Туре	Field Position Length	Field Position Start	Field Position End	Description	Valid Values	Completeness Threshold <sup>85</sup>
Total Enrollment	Num	9	932	940	The total number of members enrolled in the reporting unit. This must be total number of enrollees within the reporting unit, not the number of survey-eligible enrollees. Please refer to the Evaluate Reporting Unit Eligibility Criteria of the 2021 QHP Enrollee Survey Technical Specifications.  Note: Total Enrollment should be calculated as of 11:59 p.m. ET on January 1, 2021.  Note: If total enrollment is 500 or less, consult the 2021 QHP Enrollee Survey: Operational Instructions (available Fall 2020) for guidance.	0 – 999999999 -1 = Unknown/Missing Note: A valid value is required for every enrollee in the record. If unavailable, use -1 = Unknown/Missing. Do NOT leave field blank. Note: This variable MUST be identical for all enrollees included in the sample frame. Note: This variable MUST not be missing (0% bias variable).	100%