

**2014 PHYSICIAN QUALITY REPORTING SYSTEM:
QUALIFIED REGISTRY DATA SUBMISSION CRITERIA**

08/06/2014

Physician Quality Reporting System

Physician Quality Reporting System (PQRS) is a pay-for-reporting program that uses a combination of incentive payments and payment adjustments to promote reporting of quality information by eligible professionals (EPs) and Group Practice Reporting Option (GPRO) group practices. A qualified registry is one of the reporting mechanisms available within PQRS. A qualified registry is a medical registry or a maintenance of certification program operated by a specialty body of the American Board of Medical Specialties that, with respect to a particular program year, has self-nominated and successfully completed a vetting process (as specified by CMS) to demonstrate its compliance with the PQRS qualification requirements specified by CMS for that program year. A traditional “qualified registry” currently performs the collection and submission of PQRS quality measures data on behalf of EPs and GPROs for purposes of satisfactorily reporting. EPs and GPROs who satisfactorily report 2014 PQRS quality measure information may earn the 2014 incentive payment (0.5%) and avoid the 2016 payment adjustment (2.0%).

Additional information on the PQRS can be found on the Physician Quality Reporting System section of the CMS Web site at <http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/>.

Value-based Payment Modifier

The Value-based Payment Modifier (VM) provides for differential payment to an EP or GPRO under the Medicare Physician Fee Schedule (PFS) based upon the quality of care furnished compared to cost during a performance period. The 2016 VM will apply to groups of physicians with 10 or more EPs. Groups with 10-99 EPs will not be subject to any downward payment adjustments under quality-tiering in 2016.

Additional information regarding VM can be found on the Value-based Payment Modifier section of the CMS website at <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeedbackProgram/ValueBasedPaymentModifier.html>.

Qualified Registry Criteria

The requirements and associated timelines to become a qualified registry for the 2014 program year are listed below. Entities must complete all of the requirements prior to the due dates listed below in order to become a qualified registry.

January 31, 2014

1. Self-Nomination for PQRS

By January 31, 2014, prospective qualified registries must submit a self-nomination statement indicating intent to participate in PQRS as a qualified registry. The self-nomination statement must contain the following information:

- The name of the entity seeking to become a qualified registry.
- The entity’s contact information, including phone number, email, and mailing address.
- A point of contact, including the contact’s email address and phone number, for which to notify the entity of the status of its request to be considered a qualified registry.
- The measure number and measure title for each measure the qualified registry would be able to report for purposes of PQRS.
- The entity must attest that they meet all of the following qualified registry criteria:

- Be in existence as of **January 1, 2013**, to be eligible to participate for purposes of data collected in 2014.
- Have at least 25 participants by **January 1, 2013**, to be eligible to participate under the program with regard to data collected in 2014.
- Not be owned or managed by an individual, locally-owned, single-specialty group (for example, single-specialty practices with only 1 practice location or solo practitioner practices would be precluded from becoming a qualified registry vendor).
- Participate in monthly PQRS qualified registry support conference calls hosted by CMS (approximately one call per month).
- Enter into and maintain with participating professionals an appropriate Business Associate Agreement that provides for the qualified registry's receipt of patient-specific data from the EPs and GPROs, as well as the qualified registry's disclose of patient-specific data on Medicare beneficiaries on behalf of EPs and GPROs who wish to participate in PQRS.
- Obtain and keep on file signed documentation that each holder of an NPI has authorized the qualified registry to submit PQRS data on Medicare beneficiaries to CMS for the purpose of PQRS participation. This documentation must be obtained at the time the EP or GPRO signs up with the qualified registry for purposes of PQRS participation and must meet any applicable laws, regulations, and contractual business associate agreements.
- Provide CMS a signed, written attestation statement stating that the quality measure results and any and all data, including numerator and denominator data provided to CMS, are accurate and complete.
- Use 2014 PQRS measure specifications (individual and/or measures groups) to calculate reporting rates and performance rates, unless otherwise agreed to by CMS.
- Be able to separate out and report on Medicare Part B FFS patients.
- Be able to collect all needed data elements for at least 9 individual measures covering at least 3 of the NQS domains or a measures group.
- Be able to transmit data in a CMS-approved XML format.
- Provide CMS access (upon request) to review the Medicare beneficiary data on which 2014 PQRS registry-based submissions are founded or provide to CMS a copy of the actual data.

2. Where to Send the Self-Nomination Statements

Self-nomination statements must be sent via e-mail to the QualityNet Help Desk at Qnetsupport@hcqis.org by **5:00 PM EST on January 31, 2014**. The e-mail subject should be *PY2014 PQRS Qualified Registry Self-Nomination*. A sample self-nomination statement can be found in Appendix 1.

March 31, 2014

1. Validation Strategy

Submit an acceptable "validation strategy" to CMS by **March 31, 2014**. A validation strategy details how the qualified registry will determine whether EPs and GPROs have submitted accurately and satisfactorily on the minimum number of their eligible patients, visits, procedures, or episodes for a given measure. Acceptable validation strategies often include such provisions as the qualified registry being able to conduct random sampling of their participant's data, but may also be based on other credible means of verifying the accuracy of data content and completeness of reporting or adherence to a required sampling method.

2. Where to Send the Validation Strategy

The validation strategy must be sent via e-mail to the QualityNet Help Desk at Qnetsupport@hcqis.org by **5:00 PM EST on March 31, 2014**. The e-mail subject should be *PY2014 Qualified Registry Validation Strategy*.

May 30, 2014

1. Qualified Registry Posting

By **May 30, 2014**, CMS will post a finalized list of qualified registries on the Registry Reporting page of the CMS PQRS website. A conditionally qualified list of registry vendors will be posted by March 20, 2014. The qualified registry posting includes the vendor name, contact information, the programs being supported, measures being supported, and cost information for the services they provide to clients. Prior to posting, the registry must:

- Verify the information and qualifications for the qualified registry prior to posting (includes names, contact, measures, cost, etc.) and furnish/support for all of the services listed for the qualified registry on the CMS Website.
- Inform CMS of the cost the qualified registry charges to submit PQRS data to CMS.

Fall 2014

1. Test Submission

In **fall 2014**, qualified registries have the opportunity to complete CMS sponsored submission testing. CMS strongly encourages that qualified registries perform the file testing for the aggregate XML file as it will help qualified registries to understand what components are required and alleviate issues with the file format and submission that may occur when submitting the quality measure data.

December 31, 2014

1. Feedback Reports

By **December 31, 2014**, qualified registries must have provided feedback, at least two times, on the measures at the participant level for which the qualified registry reports on the EP's or GPRO's behalf for purposes of the satisfactory reporting in the qualified registry.

- Qualified registries may have feedback reports that are readily available via the web or other communication mechanism that allows EPs to generate reports on demand in order to fulfill this requirement.

March 31, 2015

1. Data Submission

By **March 31, 2015**, qualified registries must submit the quality measure data in the proper format to CMS on behalf of their participants.

In order to submit data, qualified registries must:

- Be able to collect all needed data elements to calculate and transmit quality measure data to CMS at the **TIN/NPI** level for at least 9 individual measures covering at least 3 of the NQS domains for submission of data on behalf of **EPs**.
- Be able to collect all needed data elements to calculate and transmit quality measure data to CMS at the **TIN** level for at least 9 individual measures covering at least 3 of the NQS domains for submission of data on behalf of **GPROs**.
- Be able to calculate and submit reporting rates or, upon request, the data elements needed to calculate the reporting rates.

- Be able to calculate and submit performance rates or, upon request, the data elements needed to calculate the performance rates.
- Indicate the reporting period.
- Indicate the number of eligible instances (reporting denominator).
- Indicate the number of instances a quality service is performed (performance met/performance numerator).
- Indicate the number of instances a quality action was not performed for a valid reason as defined by the measure specification (performance exclusion).
- Indicate the number of instances a quality action was not performed for a valid reason as defined by the measure specification (performance not met). Please note that an EP receives credit for reporting, not performance.
- Indicate the EP's or GPRO's e-mail address and have documentation authorizing the release of the e-mail address for purposes of distributing feedback reports to its participating EPs and GPROs
- Comply with a CMS-specified secure method for data submission, such as submitting the qualified registry's data in an XML file through an identity management system specified by CMS.

2. Qualified Registry Audit and Disqualification Process

After data submission concludes, CMS will analyze the data submitted by qualified registries. If inaccurate data is found, CMS has the ability to audit and disqualify qualified registries. A disqualified registry will not be allowed to submit quality measures data on behalf of its EPs or GPROs for purposes of meeting the criteria for satisfactory reporting for the following year. Disqualified entities must become re-qualified as a registry before it may submit quality measures data on behalf of its EPs or GPROs for purposes of the participants meeting the criteria for satisfactory reporting under PQRS. In addition, inaccurate data collected will be discounted for purposes of an EP or GPRO meeting the criteria for satisfactory reporting through a qualified registry.

June 30, 2015

1. Data Validation Execution Report

By **June 30, 2015**, qualified registries must perform the validation outlined in the validation strategy and send evidence of successful results to CMS for data collected in the reporting periods occurring in 2014.

2. Where to Send the Data Validation Execution Report

The data validation execution report must be sent via e-mail to the QualityNet Help Desk at Qnetsupport@hcqis.org by **5:00 PM EST on June 30, 2015**. The e-mail subject should be *PY2014 Qualified Registry Data Validation Execution Report*.

Help Desk Support

Questions regarding any of the information contained in this document can be directed to the QualityNet Help Desk:

Available: Monday–Friday; 7:00 AM–7:00 PM CT

Phone: 1-866-288-8912 TTY: 1-877-715-6222

Email: Qnetsupport@hcqis.org

Appendix 1: Sample Self-Nomination Statement

NOTE - This is a sample Self Nomination Letter. As with all documents of this nature, legal counsel review before use would be prudent. No additional information (e.g., Validation Plans, Attestation Statements) should be included in the Self Nomination Letter.

E-mail Subject: *PY2014 PQRS Qualified Registry Self-Nomination*

ABC Registry
123 Registry Avenue
Sample, MD 12345
Tel: 123-456-7890
Email: abcregistry@abcregistry.org
January 15, 2014¹

Dear PQRS Nomination Committee,

Please accept this submission as the Self Nomination of ABC Registry² for possible inclusion in the 2014 Physician Quality Reporting System (PQRS) Qualified Registry reporting mechanism. The ABC Registry hereby attests that we meet all of the detailed requirements listed in the 2014 Medicare Physician Fee Schedule Final Rule and the 2014 Physician Quality Reporting System: Qualified Registry Data Submission Criteria document that is posted on the Registry Reporting webpage on the CMS PQRS website.

ABC Registry collects data utilizing a collaboration of a practice management system and a web-based tool.³ ABC Registry intends to submit clinical quality measure data for PQRS on behalf of their eligible professionals and GPRO group practices⁴ for the 2014 reporting period starting on January 1, 2014 and ending on December 31, 2014⁵. ABC Registry intends to become qualified to submit the PQRS individual Measures #1: Diabetes Mellitus: Hemoglobin A1c Poor Control, #2: Diabetes Mellitus: Low Density Lipoprotein (LDL-C) Control, #3: Diabetes Mellitus: High Blood Pressure Control,⁶

Please address any questions to our program representative Jon Doe (123-456-7891 / jd@abcregistry.org), our clinical representative Susie Nurse (123-456-7892 / sn@abcregistry.org), and our technical representative Dan Jones (123-456-7893 / dj@abcregistry.org)⁷.

Thanks

Joe Smith

Joe Smith

ABC Qualified Registry

¹ Letter must be received no later than **5 p.m. ET on January 31, 2014.**

² Specify your Sponsoring Organization name and Registry name if the two are different.

³ Specify your data collection method (e.g., EHR, practice management system, web-based tool).

⁴ Specify whether you intend to submit on behalf of eligible professionals and/or GPRO group practices.

⁵ Specify the program year and the reporting period start and end date.

⁶ Specify the measure numbers and measure names of the individual measures and/or measures group you intend to report.

⁷ Specify the appropriate individuals to contact when beginning the vetting processes. Provide a phone and an email address for a program, clinical, and technical representative. A minimum of two representatives need to be provided.

Appendix 2: Release Notes

Changes from version 5.1 to 5.2:

- Page 4 of 7, data submission deadline revised to March 31, 2015 per CMS