



Ambulatory Surgical Center Quality Reporting Program

Support Contractor

CY 2016 OPPS/ASC Proposed Rule: Ambulatory Surgical Center Quality Reporting (ASCQR) Program Questions and Answers

Moderator:

Tamara Heron, MA
Education Coordinator, ASCQR Program

Speaker:

Anita Bhatia, PhD, MPH
Program Lead, ASCQR Program
Centers for Medicare & Medicaid Services

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Question 1: By exempting facilities that submit 240 Medicare claims or less, will this encourage facilities to not accept Medicare patients?

Answer 1: No, as finalized in the CY 2014 OPPS /ASC Final Rule (78 FR 75135 through 75137), CMS determined a minimum threshold. ASCs that have fewer than 240 Medicare claims (primary plus secondary payer) per year during a reporting period are not required to participate.

Question 2: Will this be a web-based measure, or will ASCs have to get vendors?

Answer: If you are referring to the two measures under consideration, per the current measure specifications, the measure has an aggregate numerator and denominator. However, we have not proposed any data collection requirements at this time; the measures are currently put forth for comment only. Vendors are not required. Utilizing a vendor will always be a business decision left up to the ASC.

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- Question 3:** Wouldn't the sampling size for ASC-9 and ASC-10 be based on a quarterly sampling size since the data collection period isn't for a full year? If the sampling size is quarterly, would the sampling size be for three quarters versus an entire year?
- Answer 3:** No. Facilities should still report the yearly sample size, as the yearly sample size is the smallest number that can provide a representative sample of the measure population. The purpose of the sample is to reduce the burden of 100 percent reporting.
- Question:** If we have fewer than 250 Medicare claims in 2015, we do not need to submit ASC-8 or enroll in NHSN. Is this correct?
- Answer:** No, that is not correct. If you have less than 240 claims in 2015, then your facility will be exempt from reporting quality data.
- Question:** Is there a way to be certain that all information submitted to NHSN was submitted correctly and in its entirety?
- Answer:** The best way to ensure NHSN data submission is to log in and check on the Monthly Plan, the Summary Data, and the accuracy of your facility's CCN and NPI under "Facility Information."
- Question:** Is the measure submission going to start affecting the following Calendar Year payment year? It will no longer affect two years ahead? For example, data submission submitted in 2015, will it affect 2016?
- Answer:** The payment determinations are determined based on a two-year process: the first year is the submission of QDCs on Medicare claims, and the second year is the submission of the web-based measures on the QualityNet Secure Portal or NHSN. For example, you collected/submitted QDCs in 2014 and are submitting your web-based measures (based on 2014 data) in 2015, which affects your 2016 payment determination.
- Question:** What temperature would determine if a patient is hypothermic?

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Answer: For further information and specifications for this measure for the ASC setting, you can refer to the following link:

http://ascquality.org/documents/ASC_QC_ImplementationGuide_3.0_January_2015.pdf

Question: When are we to report measures ASC -9 and ASC-10 for year 2015?

Answer: Currently, you should be reporting your ASC-9 and ASC-10 data based off of CY 2014 information. You have until September 30, 2015, at 11:59 p.m. PT to submit your data. For the CY 2015 web-based measures, you will begin submitting on January 1, 2016, and the Proposed Rule is proposing the new deadline of May 15, 2016, to have all measures answered on the web-based tool completed.

Question: I am with a new ASC as of November 2014. I would like to know how I determine if our 1500 form is communicating with CMS?

Answer: You should look at your Remittance Advice for Remark Code N365 or N620. Also, you are more than welcome to contact the ASCQR Call Center at 866.800.8756.

Question: Are Medicare claims all types of Medicare or just FFS?

Answer: For the ASCQR Program, data for the claims-based measures are to be reported for Medicare Part B Fee-for-Service (FFS) patients. Medicare Part B FFS patients include Medicare Railroad Retirement Board patients and Medicare Secondary Payer patients. Medicare Advantage patients are not included for reporting purposes. Data for web-based measures are related to all ASC patients (Medicare and non-Medicare).

Question: If we do not bill to Medicare any case... what are we required to report, and to whom?

Answer: If your facility does not submit Medicare claims, then you are not required to report to the ASCQR Program.

Question: Why is the HOPD ASC submitting under different cover?

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Answer: I am confused by what you mean with "different cover." Can you please elaborate?

Question: What reports are we downloading?

Answer: There are several reports your facility can download to confirm compliance with the ASCQR Program. These reports can be located on the QualityNet Secure Portal. You can download either the Claims Detail Report or the Provider Participation Report. You should also have received the ASCQR Program Status Report through your Secure File Transfer, which provides an overview of how your facility has reported in the last four quarters.

Question: What is MAP?

Answer: MAP stands for the Measures Alignment Partnership.

Question: The May 15 deadline is not enough time after the close of flu season, or for other web-based measures; suggest June 30.

Answer: Thank you for your suggestion. Should you feel strongly about this, please feel free to make this comment to CMS during the Proposed Rule comment period.

Question: Are the two new proposed measures going to be web-based or claims-based?

Answer: These will be measures answered on a web-based tool on QualityNet.

Question: Will additional emails/faxes be sent out to ASCs who have not submitted data to either Quality Net or NHSN?

Answer: At this time, there will be outreach phone calls to the remaining facilities. Targeted ListServes and faxes will also be sent at a later date.

Question: If finalized, when would data collection begin for the two new measures?

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- Answer:** This will be specified when the measures are proposed to be a program requirement. Currently, CMS is seeking comments for these proposed measures to be adopted in future rule-making.
- Question:** Are there a fair amount of QNet Help Desk requests regarding NHSN data not transferring to ASCQR participation reports? We are having great difficulty, and have had three different QA checks made within our organization to ensure that we have reported correctly. Any insight?
- Answer:** You will not see the NHSN data on the Participation Report until after the measure deadline, which is September 30, 2015. The CDC/NHSN will not send the complete file to CMS/QNet for updating until after the reporting period closes. The Participation Report defaults to “No” until the final data will be uploaded.
- Question:** What is the website to the *Federal Register*?
- Answer:** To view the ASC Section of the Proposed Rule in the *Federal Register*, please visit <http://www.gpo.gov/fdsys/pkg/FR-2015-07-08/pdf/2015-16577.pdf>. You will be able to locate the ASC Section on page 142 of the PDF or 39340 of the *Register*.
- Question:** Registering is a very timely process.
- Answer:** Thank you for your feedback. We will make sure your concerns are forwarded through the proper channels.
- Question:** I would recommend there be **no** time limit to logging into the website. Currently, you must completely re-register if you have not logged into the system for a certain amount of time.
- Answer:** The QualityNet website is a government website and must be maintained as secure. It is required that your account closes if you have not logged in for 365 days.
- Question:** For measures under consideration, what calendar year is the data collected for?

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- Answer:** At this time, CMS has not determined the data submission time frames. CMS will make those determinations based on the comments submitted for the Proposed Rule.
- Question:** Will ASC-8 ever be able to be reported via QualityNet?
- Answer:** There are currently no plans to change the data submission process for this measure. This data is not collected through the QualityNet Secure Portal. You must register through the NHSN to submit your ASC-8 data.
- Question:** How will the proposed measures be collected (submitted by ASCs)?
- Answer:** These proposed measures will not be collected until after they become finalized in the CY 2016 Final Rule, which will be released in November. Please see the Proposed Rule for the exact time frames of when the measures would be collected.
- Question:** For which measures are data submitted by CCN?
- Answer:** The only measure submitted by CCN is the ASC-8: Influenza Vaccination Coverage among Healthcare Providers (HCP) through the NHSN website. The public reporting of data at this time is also done by CCN.
- Question:** I have facilities who have registered with NHSN, and I can see them and their data in NHSN. However, they are not showing in the Quality Reporting Center website in the NHSN Status Listing. What needs to be done to resolve these discrepancies?
- Answer:** NHSN data will not be sent for updating on QualityNet reports until after the deadline. Also, your facilities should double check that their CCN/NPI combination listed on the NHSN website is accurate and the ASC Provider Number is not listed.
- Question:** If you have less than 240 Medicare claims, do you still have to report that, or are you automatically exempt?

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Answer: Facilities who submit 240 claims or less are not required to report data in the following year. The facility is exempted from reporting data in the next year without further action.

Question: What is the actual turnaround time for getting a log-in to do the reporting? I have had ASC admins tell me that it takes two to four months to get this accomplished. How do we meet the deadline under this circumstance?

Answer: The NHSN has streamlined their registration process and the turnaround is two weeks.

Question: What is the acceptable percent of vitrectomies? And what recommendations are given for reducing vitrectomies if high?

Answer: For further information and specifications for this measure for the ASC setting, you can refer to the following link:

http://ascquality.org/documents/ASC_QC_ImplementationGuide_3.0_January_2015.pdf

Question: How can we confirm our CCN number?

Answer: You can confirm your CCN by going to the qualityreportingcenter.com website and viewing the CCN Lookup Tool under the ASC section. If you are unable to locate your CCN, please feel free to contact the ASCQR Program Call Center at 866.800.8756.

Question: Two questions: When will the NHSN data be able to be seen on the QNet website, and will NHSN be required again in the 2015-16 flu season?

Answer: The NHSN data will not be sent to CMS/QualityNet for report updating until after the submission deadline: September 30, 2015, 11:59 p.m. PT. The NHSN data will be required next year. You will submit the next flu season data to the NHSN from Oct. 1, 2015, through May 1, 2016.

Question: Are QualityNet and NHSN the same thing?

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- Answer:** No, QualityNet is the Centers for Medicare & Medicaid Services (CMS), and the NHSN is the Centers for Disease Control and Prevention (CDC). These organizations are not the same. QualityNet is where you will submit the web-based measures ASC-6, -7, -9, and -10, and the NHSN is where you will submit your web-based measure ASC-8. ASCs must be registered for both websites in order to submit their web-based measures. The data submission period for these measures ends September 30, 2015, at 11:59 p.m. PT. Failure to complete data submission of any of these measures could result in a 2 percent APU reduction.
- Question:** We received a fax from CMS stating we were non-compliant due to non-reporting and in jeopardy of the payments for 2016. Should we just ignore the fax?
- Answer:** No. You should not ignore this fax. You must be compliant, or you are at risk of a 2 percentage point APU reduction. Please confirm data submission on all of your web-based measures through both the QualityNet Secure Portal and the NHSN.
- Question:** Thank you for your response. All have been confirmed at the beginning of June. We still received the fax even after confirmation.
- Answer:** We understand; however, if you received this fax, you really should confirm submission of all data. Also, please double check the accuracy of your facility's CCN/NPI combination on the NHSN website. If you need help, please feel free to call the ASCQR Call Center at 866.800.8756.
- Question:** For the proposal for the May 15 deadline for ASC 6–11, would that mean that for the 2017 payment year, data for those measures would need to be entered by May 15, 2016? And what about the other measures (ASC 1–5), what would their data collection deadline be?
- Answer:** Yes, this proposal would affect the data collection for the 2017 payment year, which means all 2015 web-based measures that will be submitted in 2016 would be submitted by May 15, 2016. ASC measures 1–5 would not be affected by this change, as they are

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submitted through claims. ASC 1–5 are submitted on ASC facility claims. Thus, these data are submitted on the claims submitted for reimbursement. As previously finalized, we will use a Calendar Year's claims (January to December of a year) that are processed for payment by April 30th following the close of that year.

Question: I am mainly concerned with reporting the numbers collected. We have been collecting for ASC-9 and -10 for several months, but I do not know how or where to report.

Answer: Please call the ASCQR Support Contractor at 866.800.8756, and we will gladly walk you through the submission of the web-based measures.

Question: For ASC-9 and ASC-10 – the denominator – if you have 900 cases which meet all of the inclusion and exclusion criteria to come up with 63?

Answer: You will first obtain your population for each measure by utilizing your ICD-9/HCPCS codes listed on the MIF. When you know the number in the population, you will determine the sample size required (which will be on the chart in your Specifications Manual). Again, this sample size will be either 63 or 96 based on the size of your population. All cases in the final sample size will be in your denominator. The last step is to decide if those cases fit the numerator criteria.

Question: Why was the influenza cut-off May 15th rather than August?

Answer: There was a deadline extension to September 30th, 2015, for ASC-8 for this year.

Question: It does not allow me to enter the 2014 data. Or do I need to put it under 2015?

Answer: If you are trying to submit your web-based measures through the QualityNet Secure Portal, please select the payment year 2016 to submit your 2014 data.

Question: I'm trying to submit 2014 influenza data through SAMS, and it gives me 2015 and 2016 years. Do I put it under 2015 or 2016? It was for the 2014/2015 flu season.

Answer: You should enter your information under the 2014/2015 flu season.

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Question: I understand how the normothermia outcome is reflective of the care given by the ASC, but how is an unplanned anterior vitrectomy reflective of the care at the ASC when it is the surgeon doing the cataract surgery?

Answer: While it is the surgeon who conducts the surgery, the services are being provided in the ASC and are reflective of the ASC. ASCs can utilize information on this measure to monitor the care provided in their facility and work with surgeons that may have a higher than desired level.

Question: When will the reporting of the anterior vitrectomy measure take place?

Answer: At this time there is no specific collection period. CMS is currently taking comment on this measure.

Question: We entered the QualityNet measures, but not anything to NHSN. Is this a separate registration? I cannot find us in the Lookup Tool.

Answer: Yes, there are separate registrations for the QualityNet Secure Portal and the NHSN website. If you are not able to locate your information, please feel free to contact the ASCQR Program Call Center at 866.800.8756.

Question: Is there any idea how many more measures that will be added in future years?

Answer: There is no cap to the number of measures that will be added to this program. CMS determines all new measures on a year-to-year basis and adds them, based on work with the Measures Alignment Partnership (MAP) and their Measures Under Consideration (MUC) list with comments.

Question: We have reported everything through QualityNet and NHSN; however, it's not like you get a "completed" or any notice that our reporting has been done correctly or received. So, if we have **not** received the fax stating we are in jeopardy, can I assume that we are good?

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Answer: If you have not received a fax or targeted ListServe stating your facility is in jeopardy, you, most likely, are compliant. However, it may be beneficial to confirm submission of all of your data and take screenshots (print screens) of your submitted data. You can do this at www.qualityreportingcenter.com.

Question: Our facility does not show up on the NPI to CCN tool. Do I need to take action?

Answer: If you need to confirm either your NPI or CCN, contact the ASCQR Support Contractor at 866-800-8756.

Question: Does an unplanned partial anterior vitrectomy count?

Answer: These measures are not finalized yet; they are proposed and seeking comments. Once finalized, the exclusion and inclusion criteria will be in the Specifications Manual. Please submit comments via the Proposed Rule.

Question: We have had a glitch with NHSN providing our data to CMS. What is the time frame for NHSN to transmit data to CMS?

Answer: The NHSN will transmit the data to CMS after the reporting period closes on September 30, 2015.

Question: We received a fax from CMS stating we were non-compliant due to non-reporting and in jeopardy of the payments for 2016. Should we just ignore the fax?

Answer: No. You should not ignore this fax. You must be compliant or you are at risk of a 2 percentage point APU reduction. Please confirm data submission on all of your web-based measures through both the QualityNet Secure Portal and the NHSN.

Question: Please explain the minimum case volume of 240 Medicare claims. Does this pertain to ASC-9 and -10, or is this on the billing side?

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- Answer:** Facilities that submit 240 Medicare claims or less in a given year are exempt from reporting quality data in the following calendar year. Such facilities do not need to report either the Quality Data Codes on claims or the web-based measures.
- Question:** Before the start of the presentation, it states that this presentation is being recorded. Can we go back and watch with audio again? I got internet interruption because of bad weather.
- Answer:** All webinars presented by the ASCQR Support Contractor are posted at www.qualityreportingcenter.com. The recorded webinar, written transcript, and slide deck are posted to the website approximately two to three weeks following the event.
- Question:** Do we upload reports for ASC-9 and -10 of the patients selected to report?
- Answer:** You will enter the data for ASC-9 and ASC-10 via the QualityNet website. The facility is not required to upload patient-specific reports.
- Question:** What is the website to check to see if NHSN is complete?
- Answer:** You can check on the completion of NHSN-submitted data at www.qualityreportingcenter.com.
- Question:** Can you confirm the required sampling size for ASC-9 and ASC-10 for a population size of more than 900 if we are reporting data for 4/1 thru 12/31/14?
- Answer:** For populations of 1–900 cases, the annual sample is 63 cases. For populations of 901 and more cases, the annual sample is 96 cases.
- Question:** Is there anything needed to be done re: ASC-11 this year?
- Answer:** No, the collection of ASC-11 will not begin until 2016. ASC-11 is a voluntary measure, and facilities are not mandated to report this measure.