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PSVA Demonstration and eCQM Q&A Session

Questions & Answers

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Question 1: I am getting an 'error' pop up when I try to open the PSVA tool. Who should I contact about that?

Please contact the QualityNet Help Desk at 866.288.8912.

Question 2: What is the Customer Service number for PSVA tool? (I am not asking



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for the Secure Portal Customer service number) - thanks!

Please contact the Quality Net Help Desk at 866.288.8912 for questions on accessing and downloading the Pre-Submission Validation Application (PSVA) tool. You may also submit any questions to the Question and Answer Tool located on the home page on <u>www.qualitynet.org</u> and select the "eCQMs" queue.

Question 3: To confirm, we will use the PVSA tool to submit the eCQM data to CMS. Is that correct?

The PSVA Tool is not required for eCQM submission. eCQM Data is submitted through the QualityNet Secure Portal. However, submission of test and production eCQM data files to CMS through the PSVA tool is an option for users, once the HQR system is activated later this year.

Question 4: If we have a Vendor, is this the process the Vendors utilize? Is this process specific to CART users?

Both vendors and hospitals are encouraged to utilize the PSVA Tool for eCQM reporting. CART is related to the eCQM submission process.

Question 5:What does PSVA stands for?PSVA is the acronym for Pre-Submission Validation Application.

Question 6: When we start using the PSVA tool to make secure submissions to CMS, I have used the PSVA tools to check the test files, but the option to submit was not allowed.

The initial versions of PSVA did not have the functionality included to submit files to CMS. So, what you should do is go out to QualityNet and download the latest version of PSVA and that will allow you to have that submit functionality.

Question 7: Do you have to download the PSVA tools for each CCN or can it be used for all of our CCNs?

The CMS Certified Numbers (CCNs) do not matter. So, this is really about



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the user work station on which you want to utilize the tool. The PSVA currently does not validate the CCNs that you're using to submit. So that is one thing to keep in mind. You can submit any CCN through there, but that CCN will be subject to verification and authorization rule checks once it gets to the CMS system.

Question 8: Do you need to be signed in to *QualityNet* to be able to use the PSVA tool?

No, the PSVA operates strictly on the user work station.

Question 9: Is there a manual with all the details on how to download and run the PSVA tool and, if so, where can I find it?

The user manual is included within that zip that is downloaded from the QualityNet Secure Portal. So, you can follow the on-screen directions to download the zip file, extract it, and, once extracted, you'll be able to access the user manual.

Question 10: Is there a reason for hospitals to utilize the PSVA tool, if they're utilizing a vendor?

If you are working with a vendor and your vendor is taking care of your testing and submission of your Quality Reporting Document Architecture (QRDA) files, then no, you would not necessarily have a need to use the PSVA.

Question 11: Does the PSVA tool use the same validator as the internal CMS validator?

For the schematron rules, the answer is yes; those rules are the same. I do have to say that there are some additional validations that are done by the CMS system, and that is one of the things that I alluded to earlier; the PSVA does not do CCN checks, it doesn't do program date checks. For example, there are a few verifications that the CMS system does above and beyond the PSVA tool; however, the validation rules themselves are the same.

Question 12: Will there be a webinar later in the year to go over the submission of



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production files through the portal?

Yes, a webinar on the submission of production files is certainly something we should be able to schedule.

Question 13: Will the eCQM measures be publicly reported?

In terms of any outcomes for public reporting, at this time, the current Final Rule indicates they will not be published for this year. Any updates to that will be captured in a future Final Rule.

Question 14: What happens after the test files are submitted to QNet? Is feedback provided on the test files?

So, I think I understand this question, but I will clarify a little bit. Once you submit test files to CMS, you should receive two emails within 24 hours. The first email indicates that the file was successfully uploaded. The second email identifies the file was successfully processed. If the second email is not received, please contact the QualityNet HelpDesk.

NOTE: When the test HQR system is made available later this year, the following reports will be accessible for reviewing test submissions: the Submission Detail Report, the Submission Summary Report, and the eCQM Submission and Performance Report.

Question 15: Can you submit all the files together or do you have to submit each one, each specific measure individually?

You can submit multiple measures within one file.

Question 16: Is population and sampling required with the eCQM measures that are submitted?

No, population and sampling is not required for eCQMs; however, it will continue to be required for IQR reporting on the chart-abstracted measures.

Question 17: What quarters are due and when for 2016 reporting.

For calendar year (CY) 2016, fiscal year (FY) 2018, reporting, it is either



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quarter three 2016 data or quarter four 2016 data that is due by February 28, 2017.

Question 18: Do you know if, when, or how the customers can get quality reports showing performance on each measure?

For each measure, if you submit test data, you can check calculations or measure outcomes by using the submission and performance feedback report. Once production files are accepted into the system, the performance summary report, through the QualityNet Secure Portal will allow you to review aggregate summary data for measure level information.

Question 19: Is there anything that tells you the files are processing?

From a validation perspective, yes. There is a slight delay from the time that you select validate to the time that that progress bar pops up. But, then you will see the progress bar, and you will also get a notification when the validation process is complete.

Question 20: Did you say that clicking on submit production files to CMS officially submits the files to CMS?

That is correct. The PSVA Tool will send the files to CMS for processing. After you submit, then you should still confirm that you should get the initial upload email from CMS, and you should also get the second email confirming that the file has been accepted and that processing is complete. Then, you can go in and check your final status within QualityNet. The submission button does submit the file to CMS.

Question 21: Is it required to do a test submission or is it just recommended?

It's very highly recommended to do a test submission. There are a lot of very intricate rules for QRDA and we strongly suggest that you submit test files and submit test files early to ensure your files will pass validation once you get to the time that you need to submit production files.

Question 22: In the last round of submissions, we noticed some files that process the PSVA but not CMS for some template format. Are there any known



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issues at this time?

At this time, the validation rules themselves are in alignment. The only additional checks that we would see in the CMS system are related to what I alluded to earlier, some date checks in CCN verifications. At this time, the rule should be aligned. That's what we're striving for.

Question 23: Have you developed functionality in the tool that will allow for measure of value of calculation?

We have investigated that at this time. We don't have any date, and I can't provide a structured plan for how that will be put in place. It is something that we're looking at.

Question 24: How does one get a *QualityNet* security account?

To obtain a QualityNet account, providers and vendors would need to contact the QualityNet help desk and start that paper work and request that role. Their number is 866-288-8912, or you may email them at <u>qnetsupport@hcqis.org</u>. Also, to submit eCQMs, both the hospital and vendor must obtain the EHR Data Upload Role from the QualityNet Help Desk.

Question 25: Can you elaborate on the initial patient populations? This is for acute hospitals correct, and not inpatient psych (perhaps) or rehab?

The initial patient population is for acute inpatient hospitals. The initial patient population is actually part of the eCQM, and it is basically the first part of patients that meet the criteria for that measure. Our expectation is that, when you submit eCQMs, the patients for whom you submit data should, at minimum, meet the initial patient population for that measure. So, if there are certain populations of patients (e.g., age groups) that are excluded from a particular measure, we would not expect you to submit data for that patient in the eCQM.

Question 26: Are there any eCQM measures that are listed now that will be removed beginning in 2017?

Future rulemaking indicates that kind of information. CMS will publish this information as an interim rule, requesting community feedback, and a



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Final Rule, later in the year.

Question 27: We have downloaded the PSVA file and are getting a message that our version is outdated. However, when we go in to re-download, we only have version PSVA 1.1.1.

The reason that happened is because we have updated the user guide. And, any time we update any information within the tool or the tool itself, we're going to prompt you to re-download the tool, so that you can get the newest updated information.

Question 28: You mentioned the rules are the same between hospital quality, EHR, and IQR. Does this mean that an eligible hospital can submit the exact same QRDA files for both Meaningful Use and IQR?

That is correct. If a hospital wishes to submit the same eCQMs for both programs, they would only need to submit the single file. And, it would count towards credit for both programs, given that the eCQMs that they select are applicable in both programs.

Question 29: What is the purpose of using the PSVA tool, if not for the submission of the eCQMs?

To be clear, if you are not participating in Meaningful Use or IQR, then you would not need to, you do not fall under the requirement to submit eCQMs for whatever reason. Therefore, you would not need to use PSVA at this time. The advantage to using PSVA is, if you are an IQR hospital and given that reporting eCQMs is required for CY 2016, you can test your files prior to production submission to CMS for validation, as long as you are choosing to submit QRDA files for Meaningful Use credit.

Question 30: When are both test files and production files going to be able to be accessed by the hospitals and vendors?

For the CMS system, the date that we will start accepting production submission is October first. We plan to have the system available for tests submissions prior to that date. At this time, we do not have a set date. CMS will notify the community through a variety of outlets when the HQR system will be available to receive test QRDA files.



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Question 31: How will I find out about upcoming dates and notifications regarding the eCQM submission process for 2016?

For questions and updates and notices, we highly recommend that your staff sign up for ListServes located on the <u>qualitynet.org</u> website. On the homepage on the far left, choose "Join ListServes" and sign up for the EHR notifications. These notifications will provide updates on dates and requirements and any type of news items that need to come through the system in order for you to be up to date. If you have any questions, you can always call the hospital support contractor at 844-472-4477.

Question 32: Can we still validate the structure of our QRDA 1 file by doing test submissions through *QualityNet*? And, if so, is there an advantage to doing that versus using the PSVA tool.

Yes. That option will be available. We don't have a release date for the system. So, one advantage would be that you could start earlier using the PSVA application. The other advantage would be that you don't necessarily have to log in to QualityNet each time you want to test a file, if you use the application. But yes, you will still have the option to submit test files to CMS for validation and measure outcome.

Question 33: Are we required to meet IPP for 2016, or must we also meet numerator, denominator, exceptions etc. for 2016 IQR/MU?

Successful submission is defined as submission of at least four eCQMs, which can be reported as any combination of:

- Accepted QRDA files with patients meeting the Initial Patient Population (IPP) of the applicable measures
- Zero denominator declarations
- Case threshold exemptions

Question 34: Can you update the submission file after it has already been submitted to CMS?

Yes, please review the 2016 CMS QRDA Implementation Guide for Eligible Professionals and Hospital Quality Reporting, the Appendix released February 2016, and the section on Succession Management. The documents are available on the CMS eCQM Library.



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Question 35: Can you verify that CMS 185 Healthy Term Newborn is not available for eCQM submission?

Healthy Term Newborn (HTN) is one of the 28 eCQMs available for reporting to the IQR and EHR Incentive Programs.

Question 36: Does that mean that they don't need to do any Meaningful Use attestation for all of Meaningful Use Attestation for hospitals?

Utilizing the CMS Registration and Attestation System is one method of reporting eCQMs for the EHR Incentive Program. This is not related to the CY 2016 reporting requirement of eCQMs for the IQR program. Please visit the QualityNet website for more details regarding Hospital IQR reporting.

Question 37: I do have the role for submitting CMS measures from CART. Will I be able to submit in PSVA as well? Can I use the CART file to upload here?

Submitting measures to the CMS Abstraction & Reporting Tool (CART) is unrelated to utilization of the PSVA tool; it involves different aspects of reporting to the IQR Program. Please contact the QualityNet help desk for greater clarification.

Question 38: How do we know if a vendor is submitting?

Facilities need to contact their vendor directly to determine what data is being submitted to CMS for quality reporting.

Question 39: If our vendor only allows a QRDA-I for all eCQMs available, not allowing us to narrow down to just four, can we submit all of them?

Yes, CMS is requiring a minimum of four of the available 28 eCQMs to be submitted for CY 2016 reporting to the Hospital IQR program. Facilities are permitted to submit more than the minimum of four required eCQMs.

Question 40: If there are diagnosis or procedure records that don't exist in our EHR but are required to be reported for a given Value Set from CMS, are



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we required to create those diagnosis or procedures?

Facilities are encouraged to work with their vendors to ensure their certified EHR meets CMS reporting requirements. Facilities who wish to learn more about value set requirements are encouraged to visit the electronic Clinical Quality Improvement (eCQI) Reporting Center (ecqi.healthit.gov) website for greater details.

Question 41: If we are already electronically submitting for TJC, as well as Meaningful use through our vendor, do we need to declare these four required eCQMs separately?

CMS is not requiring facilities to signal their intent to submit eCQMs for CY 2016 mandatory reporting.

Question 42: If you submit an eCQM that is also a required chart abstracted measure, do you need to submit both the eCQM and the chart abstraction?

The submission of chart-abstracted measures for the IQR program is a mandatory reporting requirement separate from the reporting requirement of eCQMs to the IQR and the EHR Incentive Program for eligible hospitals. The reporting requirement of at least four of the 28 available eCQMs can be any of the measures and are not required to have a corresponding chart-abstracted measure.

Question 43: Is CMS going to be comparing the eCQM numbers with the Manual Core Measure numbers we submit?

At this time, CMS has not provided guidance for methods of validation of eCQMs. CMS will signal their intent in future presentations, as well as during the interim and final rulemaking process.

Question 44: Is the measure logic comparable with the manually abstracted measures?

eCQMs are comprised of specifications that prescribe data elements and measure logic in order to pull data from the EHR.



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Question 45: What is the penalty if we are unable to submit the eCQM file by February 28th deadline?

As part of the Inpatient Prospective Payment System (IPPS), hospitals in the Hospital IQR program will be at risk for failing their Annual Payment Update (APU), which is a ¼ reduction in the applicable percentage increase of their APU for the applicable payment year.

Question 46: On slide 21: what does it mean that the National Quality Strategy Domain distribution will not be required?

When eCQMs were voluntarily submitted, one portion of the submission requirement was that at least three of the National Quality Strategy domains had to be fulfilled, based on the eCQMs chosen for submission. CMS has made the decision that this is no longer a requirement for CY 2016 mandatory reporting of eCQMs.

Question 47: Reading the previous Q&A – how does a facility submit eCQM without using the PSVA tool?

Facilities/vendors must have a Security Administrator account, as well as the EHR Data Upload Role to be able to upload files through the QualityNet Secure Portal.

Question 48: What is the current version of the tool?

The most current version is 1.1.1 and is posted on the QualityNet Secure Portal.

Question 49: What is the difference between PSVA and Cypress?

Cypress is an open source certification testing tool for evaluating the accuracy of Clinical Quality Measure calculations in EHRs systems and modules. Cypress enables testing of an EHR's ability to accurately calculate eCQMs. Cypress serves as the official eCQM testing tool for the 2014 EHR Certification program by the Office of the National Coordinator for Health IT (ONC).

PSVA is a downloadable tool that operates on a user's system which allows



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submitters to catch and correct errors prior to data submission to CMS. The application provides validation feedback within the submitter's system and allows valid files to be separated and submitted while invalid files are identified for error correction.

Question 50: Where are the PSVA files obtained for uploading into the tool?

The files are QRDA-1 patient level files that are generated by your certified EHR to submit them to the tool for testing.

Question 51: Will QNet provide a measure Designation Report for the EHR measures like the one that is available for IQR measures? It's very useful for confirming that our measure selections match those made by the providers.

The Measure Designation Summary report is specific to the IQR program. This report does not exist regarding the submission of electronic Clinical Quality Measures (eCQMs).