

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
1	18 Month lag for Part D data	<ul style="list-style-type: none"> • Ability of the QE to provide timely reports to providers; challenging to gain interest from providers when the information is old • QEs required to perform multiple runs of the data since the commercial data is available much sooner • Most of the quality metrics rely on the Part D data 	<ul style="list-style-type: none"> • CMS assess how much the data changes as a result of the extended adjudication process to better inform the possibility sending the data faster, although would be less complete • CMS could send the utilization data out earlier and then follow up with payment data • Consider Kaizen to explore ways to decrease the time lag of most critical RX data elements (potential funding from the NPO?) 	<p>There are rules that govern these timeframes however on 5/19 a new rule was issued allowing Part D vendors to submit their adjudication information more quickly. The new regulations are effective in July 22, 2014. NRHI offered to assist in this process if it would be helpful.</p> <p>Next steps:</p> <ol style="list-style-type: none"> 1. CMS will let NRHI know if we can be helpful in the rule-making process and/or share the rules with us when completed. 2. Oregon will share how they addressed the time lag with their reporting so that other QEs could assess if that would work for them. 	<ul style="list-style-type: none"> • CMS is still assessing how the rule changes the ability to give out Part D data. Hoping to move to a schedule similar to A and B by the end of 2014. <i>(Note date is later than previously noted)</i> • No action needed from QEs. 	<ul style="list-style-type: none"> • CMS did hear about some pushback from health plans but have not been contacted directly. The health plans wanted to ensure that the breakdown of their fees was not disclosed therefore disclosing rates. CMS aggregates this information before passing along to QEs so should not be a concern. • 2013 data may be available soon which represents a reduction in lag time. • No QE action needed.

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
2	Non-Disclosure Agreements	<ul style="list-style-type: none"> Delay in ability of QE to obtain data due to RHIC vendors' requirement for CMS vendors to execute non-disclosure agreements. 	<ul style="list-style-type: none"> CMS expedite processing of requests for NDA execution. 	<ul style="list-style-type: none"> There was some initial confusion about the request and who was being asked to execute, however that has since been resolved. CMS did need to do a legal review of the NDA to make sure there were no legal implications for them since the entity is a CMS vendor. They believe they now have a process for reviewing these and will share that with us and the QEs in the event others need to execute NDAs. <p>Next steps:</p> <ol style="list-style-type: none"> CMS will Alison will assist in getting the NDA executed. CMS will provide us with guidance on the process for the future. 	<ul style="list-style-type: none"> CMS is putting processes in place to make sure it doesn't happen again in the future. QEs can continue working with IMPAQ who will manage NDA process. 	<ul style="list-style-type: none"> CMS reports no additional requests for non-disclosure agreements.
3	Inconsistency in Phase 2 Security	<ul style="list-style-type: none"> QEs that are using a data vendor who 	<ul style="list-style-type: none"> Expedited and consistent approval 	This should not be happening and if given specific examples, they will	<p>Closed issue</p> <ul style="list-style-type: none"> CMS researched and advised NRHI that there was discrepancies between the information that vendor submitted on behalf of the 	

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
	Application Approval Process	<p>previously passed Phase 2 application are now subject to Security Improvement Plans and for different reasons, despite having the same security arrangements</p> <ul style="list-style-type: none"> • Delay in ability for QE to obtain data. 	<p>process for subsequent applications for QEs using the same, previously approved vendors with the same security arrangements.</p>	<p>work to resolve.</p> <p>Next steps:</p> <ol style="list-style-type: none"> 1. NRHI will send specific example to Niall for resolution. 	<p>three entities, which led to different responses. That information comes directly from the vendor to the CMS contractor – so QE might not be aware of issue.</p> <ul style="list-style-type: none"> • CMS has done some process improvement – streamlined across all applications to improve consistent review. 	
4	Review & Reconsideration Process	<ul style="list-style-type: none"> • Inconsistency between existing RHIC review and reconsideration processes and QE requirements places unnecessary 	<ul style="list-style-type: none"> • Apply existing RHIC review and reconsideration processes to QE program (assumes RHIC has provider stakeholder buy-in). 	<p>CMS explained this is a regulatory requirement and would require a rule change. During the public comment period, the initial proposal of 30 days received significant push back resulting in the 60 day period.</p>	<p>Closed issue</p> <ul style="list-style-type: none"> • QEs are actively participating in providing input and feedback on legislation 	

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
		<p>administrative burden on both QE and providers resulting in delay in reporting measures.</p>		<p>Next steps:</p> <ol style="list-style-type: none"> 1. NRHI continue to pursue through Legislative Avenue. 2. Oregon will share with other QEs how they have carried out the spirit and intent of the review. 		
5	Consistency across various CMS programs	<ul style="list-style-type: none"> • Significant variation in terms of access, data use, cost, timeliness and processes across CMS programs and data recipients which encourages competition versus collaboration in a given market. • QI programs like QIO need 	<ul style="list-style-type: none"> • Create an Internal Program and data alignment group within CMS similar to the approach taken by CMS for measures alignment. RHICs could participate in this group to share local experience and impact. • Federal applications for programs that require data 	<p>There was an acknowledgement that there are differences across CMS programs around the data provisioning. CMS reminded that the QEs are the ONLY ones who can use it for public reporting so that is a distinction worth noting. Agreement that creating a comparison chart related to the various programs would be helpful and CMS would be happy to assist NRHI in developing. Discussed the opportunity to work on further alignment using a similar model used for</p>	<ul style="list-style-type: none"> • CMS worked with NRHI and developed a comparison grid that will be shared with the QEC on the 8/6 conference call • Niall has not followed up yet, but he plans to. 	<ul style="list-style-type: none"> • CMS Comparison Grid shared at QEC 8/6 call. • Allison will check in with Niall to get a status.

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
		to be aligned with data programs	should take QE status into consideration.	<p>measurement alignment. NRHI would be happy to participate.</p> <p>Next Steps:</p> <ol style="list-style-type: none"> 1. NRHI will work with Allison at CMS to develop a comparison grid the various programs and the costs, uses etc. and share with the NRHI QE membership. 2. Niall will follow up with Patrick Conway and will look into convening a group to convene a group to review the various programs and look for alignment opportunities. 3. Elizabeth will help communicate the unique nature of the QE status in 		

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
				our ability to publically report on Medicare data.		
6	Alternative Measure Approval Process	<ul style="list-style-type: none"> Sharing of approved alternative measures and expedited approval process will help minimize variation and number of measures. 	<ul style="list-style-type: none"> Once an alternative measure is approved, CMS should make available as a standard measure for others to use in their Phase III application. 	<p>This is a regulatory area for CMS and any changes would be subject to rule making process. The idea is to start reporting these alternative measures at a local level and then if successful, advance to review process to become a standard measure. There is an opportunity for NRHI to coordinate our requests across QEs and use our NRHI Member Portal to share who has submitted what alternative measures.</p> <p>Next Steps:</p> <ol style="list-style-type: none"> NRHI will continue its role in capturing and sharing measures across QES including alternative 	<ul style="list-style-type: none"> NRHI facilitating a measurement sub-committee to develop common core measure set recommendation. 	<ul style="list-style-type: none"> NRHI measurement Sub-Committee work still underway; included preview of Buying Value Measure Selection Tool which was launched on 9/23/2014 http://www.buyingvalue.org/resources/toolkit/

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
				measures.		
7	Inability to display a Medicare only category	<ul style="list-style-type: none"> In some communities, the inability to display a Medicare only category (with Medicare Advantage combined with Medicare FFS) will result in an inability to include Medicare data in some public reports 	<ul style="list-style-type: none"> Ability to display a Medicare only category for a limited number of measures (e.g. cost, which has already been publicly reported by CMS) 	<p>Mylia explained that historically some RHICs have always shown the difference between payers which has value in the community to better inform action and policy. When you pull out Medicare FFS, it really changes the overall including trends. CMS advised this is a legislative requirement and suggested pursuing a research DUA for these purposes which would allow the type of reporting described. Allison further clarified that a QE could display a Medicare category if it is presented as a subset of a measure that is based on combined data. For example, a QE could report an HbA1C rate measure for Medicare + commercial patients and then report a Medicare rate and a</p>	<ul style="list-style-type: none"> Oregon going live soon and will share with other QEs how they have implemented. 	<ul style="list-style-type: none"> Oregon went live on 8/26/2014 with public Medicare reporting. Click here for press release. Oregon will present at the 10/1/2014 QEC meeting

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
				<p>commercial rate. However, the QE could not only report the Medicare rate and the commercial rate without the combined rate.</p> <p>Next Steps:</p> <ol style="list-style-type: none"> 1. QEs consider pursuing research DUAs for analysis that is prohibited through the current legislation. 2. NRHI set up a webinar for Oregon to share with other QEs and CMS what they have learned from the first round of public reporting due out by 7/31/2014. 		
8	Best Practices Capture	<ul style="list-style-type: none"> • Ability to capture and disseminate best practices among QEs will accelerate 	<ul style="list-style-type: none"> • Fund NRHI to perform these functions 	<p>CMS shared that there isn't any funding that is currently available.</p> <p>Next Steps:</p> <ol style="list-style-type: none"> 1. NRHI should 	<ul style="list-style-type: none"> • No new funding opportunities at this time. 	<ul style="list-style-type: none"> • No new funding opportunities at this time.

Qualified Entity Program Issues & Proposed Solutions

	Issue/Barrier	Impacts	Proposed Solutions	CMS Response/Next Steps	CMS Update 7/29/14	CMS Update 9/17/2014
		reporting		monitor the availability of funding.		
9	DUA Signatory	<ul style="list-style-type: none"> Data will only be released to an individual who is specifically included on the DUA. The processes for adding a signature were not clear on the various websites. 	<ul style="list-style-type: none"> Ask CMS for clarification. 	Discussed with CMS during September call and they will research and advise.	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Kari reported CMS is in the process of reviewing and updating QE materials and websites to ensure there is consistent guidance on QE DUAs. ResDAC has updated the DUA webinar. Here is the Vimeo link. CMS/IMPAQ will be working on updating the CMS privacy webpage.