

## Overview of FY 2026 Inpatient Data Validation Efforts for Hospitals Selected Randomly

#### **Alex Feilmeier, MHA**

Program Manager Value, Incentives, and Quality Reporting (VIQR) Validation Support Contractor (VSC)

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#### Purpose

This webinar will discuss the Centers for Medicare & Medicaid Services (CMS) inpatient data validation process for the Hospital Inpatient Quality Reporting (IQR) Program fiscal year (FY) 2026 payment determination and the Hospital-Acquired Condition (HAC) Reduction Program FY 2026 program year, which validates calendar year (CY) 2023 data.

## Objectives

Participants will be able to:

- Understand the FY 2026 inpatient data validation process for the Hospital IQR and HAC Reduction Programs.
- Identify data validation deadlines and required activities.
- Submit healthcare-associated infection (HAI) validation templates through the CMS Managed File Transfer (MFT) web-based application.
- Submit medical records requested by the CMS Clinical Data Abstraction Center (CDAC).
- Receive and interpret validation results.

## **Acronyms and Abbreviations**

APU	annual payment update	ED	emergency department	MFT	Managed File Transfer
CAUTI	Catheter-Associated Urinary Tract Infection	EHR	electronic health record	MRSA	Methicillin-Resistant Staphylococcus aureus
CBE	Consensus-Based Entity	FR	Federal Register	NHSN	National Healthcare Safety Network
CCN	CMS Certification Number	FY	fiscal year	PC	Perinatal Care
CCSQ	Center for Clinical Standards and Quality	HAC	Hospital-Acquired Condition	PPS	Prospective Payment System
CD	Compact disc	HAI	health-care associated infections	Q	quarter
CDAC	Clinical Data Abstraction Center	HH	Hospital Harm	SO	Security Official
CDI	Clostridioides difficile Infection	HQR	Hospital Quality Reporting	SSI	Surgical Site Infection
CLABSI	Central Line-Associated Blood Stream Infection	ICU	intensive care unit	ѕтк	stroke
СМЅ	Centers for Medicare & Medicaid Services	ID	identification	VIQR	Value, Incentives, and Quality Reporting
CPOC	clinical process of care	IPPS	inpatient prospective payment system	VSC	Validation Support Contractor
CY	calendar year	IQR	Inpatient Quality Reporting	VTE	Venous Thromboembolism
DVD	digital video disc	LabID	Laboratory Identified		
eCQM	electronic clinical quality measure	LTCH	long-term care hospital		

## Background

- Through the validation process, CMS assesses the accuracy of the following:
  - Chart-abstracted clinical process of care (CPOC) measure data within the Hospital IQR Program
  - Electronic clinical quality measure (eCQM) data within the Hospital IQR Program
  - HAI data within the HAC Reduction Program
- For chart-abstracted CPOC and HAI data validation efforts, CMS verifies on a quarterly basis that hospital-abstracted data submitted to the *Hospital Quality Reporting (HQR) Secure Portal* and to the Centers for Disease Control and Prevention National Healthcare Safety Network (NHSN) can be reproduced by a trained abstractor using a standardized protocol.
- For eCQM data validation efforts, CMS verifies on an annual basis that eCQM data submitted to the *HQR Secure Portal* align with measure specifications.
- CMS performs a random and targeted selection of inpatient prospective payment system (IPPS) hospitals on an annual basis.

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FY 2026 Data Validation Efforts

# **Alignment of Data Validation**

- HAC Reduction Program and Hospital IQR Program data submission quarters are aligned for chart-abstracted CPOC and eCQM validation (85 FR 58863–58864).
- One hospital sample will be selected and used for validation for the CPOC and eCQM measures under the Hospital IQR Program, as well as the HAI measures under the HAC Reduction Program.
- Hospitals without an active Notice of Participation for the Hospital IQR Program will only be validated under the HAC Reduction Program (83 FR 41479).

Quarter Alignment Used for Validation Affecting FY 2026 Validation Efforts				
Measures Submitted	Required Quarters of Data for Validation			
	Quarter (Q)1 2023			
Chart-Abstracted CPOC measures and	Q2 2023			
HAI measures	Q3 2023			
	Q4 2023			
eCQMs	Q1 2023–Q4 2023 (all four quarters)			

### **Data Submission**

Under the aligned validation process, any hospital selected is expected to submit data for chart-abstracted CPOC measures, eCQMs, and HAIs.

Validation Process for FY 2026 Validation Efforts				
Selection Process	Number of Hospitals	<b>Measure Type</b>		
Random Selection	Up to 200	Chart-Abstracted CPOC, HAI, and eCQM		
Targeted Selection	Up to 200	Chart-Abstracted CPOC, HAI, and eCQM		
Total	Up to 400	Chart-Abstracted CPOC, HAI, and eCQM		

### **Scoring Processes**

Under the Hospital IQR Program, there will be a combined score for the validation of chart-abstracted CPOC and eCQM measure types, with the eCQM portion of the combined score weighted at 0. CMS will continue to separately score HAIs under the HAC Reduction Program.

FY 2026 Validation Efforts				
	Quarters of Data Required for Validation	Validation Pass/Fail Criteria		
COMBINED Process (chart-abstracted and eCQM Validation): Up to 200 Random Hospitals + Up to 200 Targeted Hospitals	Q1 2023, Q2 2023, Q3 2023, Q4 2023	Chart-Abstracted Measures: At least 75% validation score (weighted at 100%) <b>AND</b> eCQM: Successful submission of 100% of requested medical records		

## CY 2023 CPOCs Validated for FY 2026

- As a part of the Hospital IQR Program, CMS will validate up to eight cases for chart-abstracted CPOC(s) per quarter per hospital.
- Cases are randomly selected from data submitted to the CMS HQR Secure Portal by the hospital.
- For all quarters of FY 2026 data validation, CMS will only validate the Sepsis measure within the CPOC measure type.

Clinical Process of Care Measures Validated in Each Quarter of FY 2026				
Submission Period Q1–Q4 2023	Validate up to 8 Cases per Quarter	Sepsis measure		

## CY 2023 eCQMs Validated for FY 2026

- As a part of the Hospital IQR Program, CMS will validate up to 32 cases from all four calendar quarters of CY 2023 eCQM data (up to 8 cases per quarter x 4 quarters) (85 FR 58950).
- From each quarter, CMS will randomly select one to eight cases per measure, depending on how many measures a hospital reported to CMS, for no more than eight cases total across all measures.
  - For example, if the hospital reports four measures (e.g., ED-2, VTE-1, VTE-2, STK-2), CMS may randomly select two cases from each measure without exceeding eight total eCQM cases per quarter.
- This process will ensure CMS evaluates a mix of eCQMs, rather than those eCQMs reported with the greatest frequency. CMS may group eCQMs prior to selection to support this strategy.

eCQMs Validated from Three Quarters of FY 2026					
Submission Period	Validate 8 cases per	Eligible eCQMs			
of all Quarters	quarter x 4 quarters =	(Cases from a mix of			
(Q1–Q4)	max 32 cases	CY 2023 eCQMs reported)			

## CY 2023 eCQMs Validated for FY 2026 (continued)

#### EHR-Based Clinical Process of Care Measures (eCQMs)

	Short Name	Measure Name	CBE#
	ED-2	Median Admit Decision Time to ED Departure Time for Admitted Patients	
	PC-05	Exclusive Breast Milk Feeding	0480
	STK-02	Discharged on Antithrombotic Therapy	0435
	STK-03	Anticoagulation Therapy for Atrial Fibrillation/Flutter	0436
	STK-05	Antithrombotic Therapy by End of Hospital Day Two	0438
	STK-06 Discharged on Statin Medication		0439
	VTE-1 Venous Thromboembolism Prophylaxis		0371
VTE-2 Intensive Care Unit Venous Thromboembolism		Intensive Care Unit Venous Thromboembolism Prophylaxis	0372
	ePC-02	Cesarean Birth	N/A
	ePC-07/SMM	Severe Obstetric Complication	N/A
	Safe Use of Opioids	Safe Use of Opioids – Concurrent Prescribing	3316e
	HH-01	Hospital Harm – Severe Hypoglycemia Measure	3503e
	HH-02	Hospital Harm – Severe Hyperglycemia Measure	3533e
07/	13/2023	EHR=electronic health record CBE=Consensus- Based Entity	Acronyms

## CY 2023 HAI Measures Validated for FY 2026

#### **HAI Measures**

Central Line-Associated Bloodstream Infection (CLABSI)

Catheter-Associated Urinary Tract Infection (CAUTI)

Methicillin-Resistant *Staphylococcus aureus* (MRSA) Bacteremia Laboratory Identified (LabID) Events

Clostridioides difficile Infection (CDI) Laboratory Identified (LabID) Events

Surgical Site Infection (SSI)

Selected hospitals will be randomly assigned to submit, for each quarter of the fiscal year, either: CLABSI AND CAUTI validation templates OR MRSA AND CDI validation templates.

## CY 2023 HAI Measures Validated for FY 2026 (continued)

Candidate HAI Cases Selected for Each Quarter					
Template Types Assigned to Submit	Data Selected from HAI Validation Templates	Data Selected from Medicare Claims Data	Total Cases Selected		
CLABSI and CAUTI	up to 4 CLABSI + up to 4 CAUTI	up to 2 SSI	up to 10		
MRSA and CDI	up to 4 MRSA + up to 4 CDI	up to 2 SSI	up to 10		

CMS will select and validate up to 10 candidate HAI cases total per quarter per hospital.

- All selected hospital will be validated for SSI.
  - SSI cases are not submitted using validation templates but are selected from Medicare claims-based data submitted to CMS.
  - Requests identified from Medicare claims data may include a request for an index admission and readmission record. When both types are requested, both records should be submitted.
- When there are not enough candidate cases for any one specific infection to meet the targeted number of cases, CMS will select the candidate cases from other infection types to meet sample size targets.

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**Hospital Selection** 

### **Hospital Selection**

#### Random hospital selection

• In June 2023, up to 200 hospitals were selected.

#### Targeted hospital selection

- In early 2024, up to 200 additional hospitals are anticipated to be selected as targeted.
- The targeted hospital selection is identified after the confidence interval is calculated for the *previous fiscal year's* validation effort. Additional information about targeting will be covered on the next slide.

All random and targeted hospitals selected for validation are subject to the same requirements. Hospitals selected randomly cannot also be selected as targeted within the same fiscal year. The selected hospital list posted on QualityNet does not publicly indicate which hospitals were selected randomly vs. targeted.

## **Hospital Targeting**

CMS targets hospitals for validation based on multiple criteria outlined in the FY 2014 and FY 2019 IPPS/Long-Term Care Hospital Prospective Payment System (LTCH PPS) final rules (78 FR 50833–50834 and 83 FR 41480). The targeting criteria as outlined in the rule, with relevant dates for FY 2026 targeting, are summarized as:

- Failure to meet validation requirements in FY 2025
- Abnormal or conflicting data patterns
- Rapidly changing data patterns
- Submission of data to NHSN after the submission deadline
- Not having been validated in the previous three years
- Lower bound confidence interval less than or equal to 75% in FY 2025 and/or
- Failure to report at least half of HAI events detected during FY 2025 to NHSN.

## **Notification of Hospital Selection**

Random and targeted hospital selections will be notified.

- A news article, along with the list of selected hospitals, is posted on the CMS QualityNet website: <u>https://qualitynet.cms.gov</u>
- A Listserve is released to notify the community that the selection has occurred.
- An email communication from the VSC is sent directly to the hospitals selected.

# **Email Notification of Selection**

- The email communication is sent to the following hospital contact types listed within the official CMS contact database:
  - $\circ$  Chief Executive Officer/Administrator
  - Hospital IQR
  - o Infection Control
  - Medical Records CDAC
  - Quality Improvement
- The VSC monitors email communications to ensure all hospitals are notified of selection. Undeliverable emails are researched, and hospital contacts are asked to update their information in the CMS system to ensure future notifications are received.
- We suggest hospitals ask their Information Technology department to add <u>validation@telligen.com</u> to their Safe Senders List to ensure validation-related email notifications are received.

#### **Update Contact Information**

- Hospitals should regularly update their contact information to ensure receipt of validation-related communications and reminders.
- Hospitals may check and update contacts by sending an email with their six-digit CMS Certification Number (CCN)/Provider ID number to the Inpatient VIQR Outreach and Education Support Contractor at <u>QRFormsSubmission@hsag.com</u>.

## **Selected Hospital List**

The list of the hospitals selected for validation can be found on the inpatient Data Validation Resources page of the QualityNet website. To access the list:

- 1. Navigate to the CMS QualityNet website at <a href="https://qualitynet.cms.gov">https://qualitynet.cms.gov</a>.
- 2. Select [Hospitals-Inpatient].
- 3. Select [Data Management].
- 4. Select [Data Validation].
- 5. Select [Resources].

#### Direct link:

https://qualitynet.cms.gov/inpatient/data-management/data-validation/resources

Home / Hospit <b>Resour</b>		nagement / Data Validatio	ion /	
Overview	Educational Reviews	CDAC Information	Resources	
Resources		Data Validatio	on Resources	
үүүү НАІ Ма	inuals & Tools		formation and resources regarding the Centers for Medicare & Medicaid Services (CMS) inpatier s within the Hospital Inpatient Quality Reporting (IQR) Program, as well as the Hospital-Acquired	
Archived Resources		Condition (HAC) Reduction Program, which includes the required submission of Healthcare Associated Infection (HAI) Validation Templates for the following measures: central line-associated blood stream infection (CLABSI), catheter-		
			act Infection (CAUTI), Methicillin-Resistant Staphylococcus Aureus (MRSA) laboratory-identified idium difficile Infection (CDI).	

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**Overview of Validation Process, Results, and Scores** 

### **Validation Process**

- All selected hospitals will submit HAI Validation Templates for each quarter of the validation year.
- For FY 2026 inpatient data validation efforts, selected hospitals will receive five total medical record requests from CDAC:
  - Four quarterly requests containing clinical process of care and HAI selected cases
  - One annual request containing eCQM selected cases
- Hospitals selected *randomly* should follow the deadlines associated with the random hospitals and hospitals selected as *targeted* should follow the deadlines associated with targeted hospitals.

Estimated Arrival of Medical Record Request Packets for Hospitals Selected Randomly				
Quarter/Year	Measure Types	Estimated Arrival		
Q1 2023	CPOC and HAI	August 2023		
Q2 2023	CPOC and HAI	December 2023		
Q3 2023	CPOC and HAI	February 2024		
Q4 2023	CPOC and HAI	June 2024		
CY 2023	eCQM	spring 2024		

### Validation Process (continued)

- The CDAC will send the written request using a mail delivery service. The request will provide instructions to submit the patient medical record for each case that CMS selected for validation.
- Hospitals deliver requested medical records to the CDAC in the order they are requested (based on deadline), and the CDAC then abstracts and adjudicates the selected cases.
- For all measure types, the CDAC will abstract from the complete medical record submitted by the hospital based on the specifications for each respective program/measure. The medical record must contain sufficient information for the CDAC to determine measure eligibility and/or outcome.
- CMS data validation is at the measure level; it is not scored at the individual question/data element level. If CDAC does not reach the same outcome as the hospital's original submission, then the case may be considered a mismatch.
  - When validating cases, the CDAC reviews data found in both discrete and non-discrete fields in the medical records submitted as portable document format files.

## **Validation Results**

- Approximately 4-5 months after each medical record submission deadline, hospitals will see validation results for the quarter/reporting period.
- The results will show the outcomes of abstraction determined by the CDAC on each selected case.
- Hospital registered users with the Validation permission will receive an email notification when their results become available to view on the HQR Secure Portal.
  - It is strongly recommended that hospitals have multiple active users with the Validation permission in the HQR Secure Portal to ensure validation result notifications are received and reviewed timely.
- Hospitals may submit an educational review request within 30 days of receiving quarterly results.
  - Completed educational review forms must be submitted within
    30 days of the validation results being posted on the HQR Secure Portal.

### **Validation Scores**

- CMS calculates a total score reflecting the reliability of the measures validated after all quarters/reporting periods have been completed and all results are available.
- CMS computes a confidence interval around the score after the educational review results are taken into consideration.
  - If the upper bound of this confidence interval is 75% or higher, the hospital will pass the validation requirement.
  - If the confidence interval is below 75%, the hospital will fail the validation requirement.
- The Hospital IQR Program will calculate a confidence interval using only the CPOC and eCQM measures.
- The HAC Reduction Program will calculate a *separate* confidence interval using *only* the HAI measure(s).
- Hospitals that fail validation will also automatically be selected for validation in the next fiscal year.

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**HAI Validation Template Process** 

## **HAI Validation Templates**

- Hospitals fill out HAI validation templates to submit to the VSC via the CMS MFT web-based application for each quarter of the fiscal year.
  - It is strongly recommended that each hospital have at least two Security Officials (SO).
  - If you are unable to log in to the HQR Secure Portal, contact your hospital's SO.
  - If your SO is unable to reestablish your access, contact the Center for Clinical Standards & Quality (CCSQ) Service Center.
- HAI validation templates are not validated; they are used to prompt the selection of cases to be included in the medical records request packet.

### **HAI Case Selection**

- CMS randomly selects cases from each HAI validation template type submitted per hospital being validated.
- Hospitals do not submit validation templates for SSI cases.
- After the HAI validation template submission deadline has passed, data submitted on HAI validation templates cannot be changed.

## FY 2026 HAI Validation Template Submission Deadlines

HAI Validation Template Due Dates for Hospitals Selected Randomly				
Discharge Quarters	HAI Validation Template Deadline			
<b>Q1 2023</b> (January 1–March 31)	08/15/2023			
Q2 2023 (April 1-June 30)	11/15/2023			
Q3 2023 (July 1–September 30)	02/15/2024			
<b>Q4 2023</b> (October 1–December 31)	05/15/2024			

- Validation templates are due no later than 11:59 p.m. Pacific Time on each associated deadline date. Hospitals may submit validation templates immediately following the last day of each quarter period.
- For the entire validation fiscal year, hospitals selected **randomly** should follow the deadlines associated with the **random** hospitals only, and hospitals selected as **targeted** should follow the deadlines associated with the **targeted** hospitals only.

## HAI Validation Template Version and Location

- Use the current template version for each fiscal year only.
  - Templates from previous years will be rejected.
  - Do not save validation templates with a password and do not lock them.
- Current/correct validation template versions for the fiscal year being validated are available on the inpatient data validation resources page of QualityNet.
- To access resources:
  - 1. Navigate to the QualityNet website: <a href="https://qualitynet.cms.gov">https://qualitynet.cms.gov</a>
  - 2. Select [Hospitals-Inpatient].
  - 3. Select [Data Management].
  - 4. Select [Data Validation].
  - 5. Select [Resources].

Direct link:

https://qualitynet.cms.gov/inpatient/data-management/data-validation/resources

## **HAI Validation Template Tabs**

- There are four tabs on each validation template:
  - 1. Definitions
  - 2. Template
  - 3. NHSN Intensive Care Unit (ICU) Location
    o For CLABSI and CAUTI NHSN ICU Location
  - 4. FY Submission Instructions
- **Do not** alter or change the original format of the validation templates.
- Do not delete, rename, or change the order of the tabs.





## HAI Validation Template Completion Tips

- Refer to the Validation Template User Guide and Submission Instructions document posted on the inpatient Data Validation Resources page of QualityNet.
- **Review** the Definitions tab on each validation template for direction on filling out specific fields.
- **Do not alter** the original format of the validation templates.
- **Use** the drop-downs provided in the templates to select valid values.
- **Check** all dates for accuracy, as well as ensure any cases with a separate Inpatient Rehabilitation Facility or Inpatient Psychiatric Facility CCN are not included on the template.
- **Perform** a quality check of data entered in this template against data entered in NHSN; stay mindful of differing CMS and NHSN deadlines.
- **Submit only** via the CMS MFT web-based application, as validation templates contain Protected Health Information and cannot be sent via email.

# HAI Validation Template Processing

- Hospitals typically receive feedback regarding the status of validation templates within two business days of initial submission.
- If a processing confirmation is not received, email the VSC at <u>validation@telligen.com</u>.
  - Include the hospital six-digit CCN/Provider ID.
- After validation templates are processed, the submitter of the template and the contact listed in the template's first row will receive a confirmation receipt email indicating one of two things:
  - 1. Successful submission

#### OR

2. Errors have occurred that require attention and resubmission

#### HAI Validation Templates Not Received

- At predetermined points leading up to the validation template deadline each quarter, the VSC will send emails and attempt to contact any hospitals that have not yet submitted.
- Validation templates with errors are **not** considered submitted.
- If a hospital does not submit the required quarterly validation templates to CMS by the deadline, they will be assigned placeholder cases.
  - $\circ~$  Up to 10 placeholder cases can be assigned.
  - $\circ$  All assigned placeholder cases are scored 0/1.
- If a hospital submits a validation template and receives an errornotification email but does not make corrections and resubmit by the template submission deadline, placeholder cases will also be assigned and scored 0/1.

## HAI Validation Template Processing Errors

A hospital submitting a validation template with processing errors will receive an email notification indicating which errors need correction.

- Make the corrections specified in the email.
- Resubmit the file via the CMS MFT application by the submission deadline.
  - Do **not** attach a template to the error email or this will be considered a CMS security incident.
- Validation templates may only be resubmitted until the quarterly deadline.
- If error emails are received, these errors must be corrected, and the template must be resubmitted **prior to the submission deadline**.
   An error in the template does **not** extend the submission deadline.
- When resubmitting a revised validation template, include a note in the CMS MFT application message indicating there is a revised template.
  - Include the word *Revised* or *Resubmission* in the file name.
    - 012345\_3QYY\_FYXX\_CAUTI\_ValTemp\_**Revised**.xlsx

# HAI Validation Templates Data Discrepancy

- The validation templates are used to randomly select cases for validation. If the data are incorrect on the template, they **could** result in mismatches.
- If a hospital receives an email from the VSC asking for review of a validation template due to a possible discrepancy, reply and indicate one of the following:
  - A new validation template has been submitted.

#### OR

- The data are accurate as submitted and no changes are needed.
- The following are examples of discrepancy checks:
  - Listed CAUTI/CLABSI culture dates are not between the admit/discharge date.
  - Differences in data exist on multiple rows of the template that appear to be the same patient and same episode of care.
  - Discrepancies between the two assigned template types exist where a patient is listed on both templates, but the birth/admit date/discharge dates are different from what appears to be the same episode of care.

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#### **Medical Record Requests and Submission**

## **Medical Record Request Packet**



- The CDAC will send a written request via FedEx addressed to "Medical Records Director" asking for submission of a patient medical record for each case and candidate case that CMS selected for validation.
- It is important that the packet be routed as soon as possible to the correct individual(s) responsible for fulfilling the request.

**Note:** The medical records request will be delivered to the address listed under the CDAC MEDICAL RECORDS contact type in the official CMS database. Hospitals may check the address and make updates to the address by sending an email with their six-digit CCN/Provider ID to the Inpatient VIQR Support Contractor at <u>QRFormsSubmission@hsag.com</u>.

# Supplemental Medical Record Request Information

CMS will release a Case Selection Report to supplement this medical records request. This will also list the cases selected for validation and the receipt status. This report can be accessed via the *HQR Secure Portal* by a registered user with the Validation permission.

To access the report:

- 1. Log in to the HQR Secure Portal: https://hqr.cms.gov/hqrng/login
- 2. From the left-side navigation dashboard, select **Program Reporting.** Then, select **Validation.**
- 3. Under Program, select Inpatient.
- 4. Under Report, select the applicable case selection report.
- 5. Under Period, select the applicable quarter/reporting period.
- 6. Under Provider(s), select the applicable hospital(s).

# **Medical Record Submission**

- Hospitals are not allowed to submit records or additional documentation after CDAC receives the record; this applies even if the wrong record is sent or if pages are missing, or illegible, etc.
- The CDAC will only abstract every case with the **original** applicable documentation that was received from the hospital.
- It is critical that hospitals have a process for reviewing each of their records before they are submitted to the CDAC.
  - Consider having an abstractor review your records prior to submission, as they are most familiar with the location of the information needed for abstraction.
  - Compare extracted data with other information in the record to ensure Quality Reporting Document Architecture submissions report quality in alignment with the measure specifications.
  - Closely examine the accuracy of time-stamps such as arrival times and medication administration times.

# Medical Record Submission Deadline

- Hospitals have until the date listed on the request to send their records to the CDAC.
  - Inpatient medical records must be received within 30 calendar days of the request date.
- CMS finalized policy which requires the use of electronic file submissions via the CMS MFT application.
- Submission of paper copies of medical records or copies on digital portable media such as CD, DVD, or flash drive are not allowed.
- Additional information regarding medical records requested by the CDAC can be found on inpatient Data Validation CDAC Information page of QualityNet: <u>https://qualitynet.cms.gov/inpatient/datamanagement/data-validation/cdac-info</u>

# Medical Record Submission "Do's and Don'ts"

- A helpful document titled Record Submission Do's and Don'ts can be found on the Inpatient Data Validation CDAC Information page of QualityNet.
  - Direct link:

https://qualitynet.cms.gov/inpatient/datamanagement/data-validation/cdac-info

• This document provides tips for avoiding medical record submission errors.

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# Validation Reports, Educational Review, and Reconsideration

# **Validation Reports**

Validation reports are on the HQR Secure Portal:

- Case Selection Report
- Case Detail Report
- Confidence Interval Report

CMS continues to modernize the HQR Secure Portal. Data validation reports and the way hospital data display may change in the coming months.

# **Case Selection Report**

- The report displays the patient-identifying information pertaining to the cases selected for validation. The cases on this report are the same cases as outlined within the medical records request packet sent by the CDAC.
- The report displays the Medical Record Request Date, the Due to CDAC Date, and the Record Received Date (after the CDAC has received the hospital's records).
- It could take up to 24 hours for the Record Received Date to populate. To verify receipt of records, contact the CDAC directly at 717-718-1230, ext. 201, or email <u>CDAC Provider Helpdesk@tistatech.com</u>.

							Abstraction			
	Patient	Patient			Discharge		Control	Medical Record		
Patient Identifier	Last Name	First Name	DOB	Admit Date	Date	Measure Set	Number	Request Date	Due to CDAC By	Record Received
Patient1	Doe	John1	1/1/2020	1/1/2020	1/2/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient2	Doe	John2	1/2/2020	1/2/2020	1/3/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient3	Doe	John3	1/3/2020	1/3/2020	1/4/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient4	Doe	John4	1/4/2020	1/4/2020	1/5/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient5	Doe	John5	1/5/2020	1/5/2020	1/6/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient6	Doe	John6	1/6/2020	1/6/2020	1/7/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient7	Doe	John7	1/7/2020	1/7/2020	1/8/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	
Patient8	Doe	John8	1/8/2020	1/8/2020	1/9/2020	IQR-SEP	MA010A000XXX	10/8/2020	11/16/2020	

# Accessing the Case Selection Report

To access the Case Selection Report from the *HQR Secure Portal*:

- 1. Log in to the *HQR Secure Portal*: <u>https://hqr.cms.gov/</u>
- 2. From the left-side navigation dashboard, select **Program Reporting.** Then, select **Validation.**
- 3. Under Program, select Inpatient.
- 4. Under Report, select the applicable case selection report.
- 5. Under Period, select the applicable quarter/reporting period.
- 6. Under Provider(s), select the applicable hospital(s).

# Accessing the Case Detail Report

The Case Detail Report provides a list of all elements abstracted compared to the CDAC re-abstraction on each case and becomes available after the hospital receives results for the quarter. To access the Case Detail Report in the *HQR Secure Portal*:

- 1. Log in to the HQR Secure Portal: <a href="https://hqr.cms.gov/">https://hqr.cms.gov/</a>
- 2. From the left-side navigation dashboard, select **Program Reporting.** Then, select **Validation.**
- 3. Under Program, select Inpatient.
- 4. Under Report, select the applicable case detail report.
- 5. Under Period, select the applicable quarter/reporting period.
- 6. Under Provider(s), select the applicable hospital(s).

# Requesting an Educational Review

- If a hospital has a question or needs further clarification on a particular outcome, the hospital may request an educational review within 30 days of validation results appearing on the HQR Secure Portal.
- The educational review process and educational review forms are on the inpatient Data Validation Educational Reviews page of QualityNet:

https://qualitynet.cms.gov/inpatient/data-

management/data-validation/educational-reviews

# Educational Review: Corrected Scores

- If a hospital requests an educational review and this review yields incorrect CMS validation results, the corrected scores will be used to compute the final confidence interval.
  - A hospital's Case Detail Report will not be changed to reflect updated results.
- Hospital IQR Program: The annual confidence interval will include the updated scores for any applicable quarters of CPOC and/or eCQM measures.
- HAC Reduction Program: The annual confidence interval will include the updated scores for any applicable quarters of HAI measures.
  - The HAC Reduction Program does not have a reconsideration process; therefore, CMS urges hospitals to submit Educational Reviews within the 30-day timeframe of receiving their quarterly results.

# **Confidence Interval Report**

- CMS computes a confidence interval around the score after the educational review results are taken into consideration.
- Hospitals will receive two *separate* Confidence Interval Reports:
  - One for the clinical process of care and eCQM cases validated under the Hospital IQR Program
  - One for the HAI cases validated under the HAC Reduction Program
- A detailed FY 2026 confidence interval document will be posted on the inpatient Data Validation Resources page of QualityNet: <u>https://qualitynet.cms.gov/inpatient/data-management/data-validation/resources</u>

# Confidence Interval Report: Hospital IQR Program

- CMS will calculate a combined reliability score reflecting the validation results of both chart-abstracted CPOC measures and eCQMs.
  - This single score will reflect a weighted combination of a hospital's validation performance for chart-abstracted CPOC measures *and* eCQMs.
- Since eCQMs are not currently scored for accuracy, eCQMs will receive a weight of 0. Chart-abstracted CPOC measures will receive a weight of 100% (85 FR 58952).
- Although the accuracy of eCQM data and the validation of eCQM measure reporting will not affect payment in the Hospital IQR Program at this time, hospitals will pass or fail the eCQM validation criteria based on the timely and complete submission of all the eCQM records CMS requests.
  - For example, if 32 eCQM medical records are requested, all 32 eCQM medical records must be submitted to meet the 100% requirement.

# Confidence Interval Report: Hospital IQR Program (continued)

- For the Hospital IQR Program validation requirement:
  - If the upper bound of the confidence interval is 75% or higher, the hospital will pass the Hospital IQR Program validation requirement.
  - If the confidence interval is below 75%, the hospital will fail the Hospital IQR Program validation requirement and may not receive the full Annual Payment Update (APU).
- Hospitals that fail an inpatient validation requirement will also automatically be selected for inpatient validation in the next fiscal year.
- The Hospital IQR Program validation Confidence Interval Report for FY 2026 payment determination is expected around January 2025, and the APU results are expected around March 2025.
- Additional information is on the APU page of the Hospital IQR Program page of QualityNet: <u>https://qualitynet.cms.gov/inpatient/iqr/apu</u>

# Confidence Interval Report: HAC Reduction Program

- For the HAC Reduction Program validation requirement:
  - If the confidence interval is 75% or higher, the hospital will pass the HAC Reduction Program validation requirement.
  - If the confidence interval is below 75%, the hospital will fail the HAC Reduction Program validation requirement.
- Hospitals that fail an inpatient validation requirement will also automatically be selected for inpatient validation in the next fiscal year.
- As described in the FY 2019 IPPS/LTCH PPS final rule (83 FR 41481– 41482), for hospitals that fail validation, CMS will assign the maximum Winsorized z-score (worst score) only for the set of measures validated.
  - For example, if a hospital was selected for validation on CLABSI, CAUTI, and SSI, but failed validation, that hospital will receive the maximum Winsorized *z*-score for CLABSI, CAUTI, and SSI.

# Confidence Interval Report: HAC Reduction Program (continued)

- The FY 2026 program year HAC Reduction Program validation Confidence Interval Report is expected around January 2025.
- The HAC Reduction Program Hospital-Specific Report, expected in July 2025, includes the hospital payment adjustment notification.
- Additional information can be found on the HAC Reduction Program Payment Adjustment page of QualityNet: <u>https://qualitynet.cms.gov/inpatient/hac/payment</u>

# Reconsideration Of Validation Results for Hospital IQR Program

- Within the Hospital IQR Program, if a hospital does not meet or exceed the 75% upper bound confidence interval threshold, the hospital will receive a letter in late spring indicating they have not met the validation requirement of the Hospital IQR Program and may be subject to a reduction of their APU.
  - At that time, a hospital may request a reconsideration. The hospital would then provide the reason they are asking CMS to reconsider their results.
- For information specific to the APU determination and/or reconsideration process under the Hospital IQR Program, you may reach out to the Inpatient Support Contractor at the following email: <u>InpatientSupport@hsag.com</u>
- Currently, the HAC Reduction Program does not have a reconsideration process; therefore, CMS urges hospitals to submit Educational Reviews within the 30-day timeframe of receiving their quarterly results.

### **Proposal to Request Reconsideration** of Validation Results – HAC Reduction

- In the FY 2024 IPPS/LTCH PPS Proposed Rule, CMS has proposed that, beginning with FY 2025 program year (CY 2022 discharges), hospitals that fail validation be allowed to request reconsideration of their validation results **before** use in HAC Reduction Program scoring calculations.
- This proposal would more closely align the validation reconsideration process across the Hospital IQR and HAC Reduction Programs. If finalized, additional information on the process specifics will be posted on the CMS QualityNet website.

Overview of FY 2026 Inpatient Data Validation Efforts for Hospitals Selected Randomly

#### Resources

### Resources

- To access data validation resources discussed in this presentation, as well as some resources not covered:
  - 1. Navigate to the QualityNet website: <a href="https://qualitynet.cms.gov">https://qualitynet.cms.gov</a>
  - 2. Select [Hospitals-Inpatient].
  - 3. Select [Data Management].
  - 4. Select [Data Validation].
  - 5. Select [Resources]. Direct link: <u>https://qualitynet.cms.gov/inpatient/data-management/data-validation/resources</u>
- For assistance logging into the *HQR Secure Portal*, contact the CCSQ Service Center:
  - o Call 866-288-8912 from 8 a.m. to 8 p.m. Eastern Time, Monday–Friday.
  - o Email <u>QNetSupport@cms.hhs.gov.</u>

# **Validation Questions**

When submitting a question, include the hospital six-digit CCN/Provider ID to expedite a reply that includes information specific to your hospital.

- VSC email: <u>validation@telligen.com</u>
- CMS Hospital Inpatient Questions and Answers Tool: <u>https://cmsqualitysupport.servicenowservices.com/qnet\_qa</u>

Overview of FY 2026 Inpatient Data Validation Efforts for Hospitals Selected Randomly

**Question and Answer Session** 

# **Continuing Education Approval**

This program has been approved for <u>continuing education</u> <u>credit</u> for the following boards:

- National credit
  - Board of Registered Nursing (Provider #16578)
- Florida-only credit
  - Board of Clinical Social Work, Marriage & Family Therapy and Mental Health Counseling
  - Board of Registered Nursing
  - Board of Nursing Home Administrators
  - Board of Dietetics and Nutrition Practice Council
  - Board of Pharmacy

**Note:** To verify continuing education approval for any other state, license, or certification, please check with your licensing or certification board.

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