

2025 Pre-Rulemaking Webinar: Questions and Answers Summary

General

1. What are the current priority topics for measures in CMS programs?

- Each year, CMS Programs conduct a comprehensive review to identify high-need areas specific to their programs. These findings are subsequently detailed in the [Program-Specific Measure Needs and Priorities report](#). Additionally, CMS maintains agency-level priorities focusing on key topic areas such as physical fitness, nutrition, and chronic diseases. The agency also continues to emphasize other critical measure areas, including safety, behavioral health, and maternal health, as well as measures that support appropriate utilization.

Measure Submissions

1. Who can submit measures for consideration?

- Anyone can submit measures for consideration. The [CMS Pre-Rulemaking Guidance for Measure Submitters](#) webpage, found on the HHS Hub, discusses the requirements and steps for measure submission.

2. Is the information that I submit on CMS MERIT publicly accessible? Can anyone see it?

- The measure information you input is viewable to anyone with a [CMS MERIT](#) account, and accounts are granted to any party that requests one. Should your measure be accepted onto the 2025 MUC List, all attachments submitted will also be made available on the [MUC List Supporting Materials](#) page on the MMS Hub website to assist with the Pre-Rulemaking Measure Review (PRMR).

3. Can you provide additional details on why the measure submission deadlines have moved up substantially over the last several years?

- Each year, CMS reviews the previous year's processes and evaluates the time required to conduct thorough and complete reviews of all measures submitted to [CMS MERIT](#). After the program review of measures, a draft Measures Under Consideration (MUC) List is generated and shared through various measure review and clearance processes. This involves review by all of CMS, other interested agencies within the Department of Health and Human Services (HHS), and the Executive Office of the President (EOP) before final approval is granted.

The comprehensive review by all parties involved in the MUC List is time-intensive and necessary prior to publication. Statutorily, the MUC List must be posted on or before December 1 annually. Behind the scenes, the PRMR team is also diligently preparing for reviews and meetings to complete their report by February 1 annually. Advancing the deadline for candidate measure submissions provides ample time for CMS and interested parties to review, offer input, and allows the PRMR team sufficient time to prepare for their work.

- 4. Can you share how many measures are submitted to the MUC List each year, and what percentage of those are accepted to the MUC List each year?**
- The number of submissions and accepted measures varies annually, depending on CMS Programs' needs and the measures that address gaps within the programs to which they are submitted. We provide the total number of submissions and accepted measures in the annual MUC List Overview documents that accompany the MUC List Excel. This document is available on the [Pre-Rulemaking MUC Lists and Recommendation Reports](#) page, accessible through the MMS Hub.
- 5. How do I see if a measure was submitted through the MUC List?**
- All measures accepted to the MUC List can be found by reviewing the MUC List Excel documents on the [Pre-Rulemaking MUC List and Recommendation Reports](#) page, accessible through the MMS Hub. This location houses every MUC List dating back to 2011. Additionally, any measures submitted to the pre-rulemaking process since 2012 are available in the [CMS Measures Inventory Tool \(CMIT\)](#).
- 6. If a submitted measure fails to be put on the MUC List, will CMS provide the reason why?**
- If a measure is not selected for inclusion in that year's MUC List, CMS Programs typically communicate the reasons to the submitter via email or through the [CMS MERIT](#) tool. Should you require further clarification, additional information regarding the decision can be requested from the program.
- 7. Can you share more about where we can find measures that have been submitted but not accepted? I am only able to find measures that have been accepted.**
- Users with a [CMS MERIT](#) account, which is available for free to anyone who requests one, can access the "Past Candidate Measures" tab. This tab serves as a repository for candidate measure submissions, dating back to the creation of the CMS MERIT tool in 2013. It allows users to filter by year, program, measure type, and status. This feature enables users to view which measures were accepted or rejected.
- 8. What do you mean by systematic measure assessment?**
- CMS carefully reviews all measure data provided to evaluate healthcare quality measures as fairly as possible. They use consistent and standardized methods to make decisions about developing, selecting, continuing use of, or removing measures. This involves examining the data that is submitted through the Pre-Rulemaking process, as well as considering more detailed opinions from group discussions that typically occur during the consensus-based entity (CBE) processes. Together, these evaluation processes help provide CMS with criteria for measure selection that are clear and distinct.

Measure Testing

1. If a measure is submitted without complete testing results, what is the process for providing updates to the MUC submission with measure testing results?

- Measure submitters should submit their most up to date and complete measure testing results prior to the closing of [CMS MERIT](#) by 8:00 PM ET on Thursday, May 1st. There is no option for submitters to update measure testing information in the tool once the submission period has closed. Updated testing data for measures selected for inclusion on the MUC List will be requested by CMS in the fall to assist in the PRMR review process.

eCQM

1. Will there be education on eCQM development?

- We have previously hosted presentations on digital quality measurement and eCQMs. These are available on the [CMS MMS Hub](#).

We also welcome ideas for future webinars and/or resources if there is a specific aspect of eCQMs you would like to learn more about. Please email us at MMSSupport@battelle.org with your ideas.

PRMR Process

1. Could you clarify how Battelle addresses developer feedback on the PAs?

- Our focus is on fostering collaboration with developers to ensure the most accurate review of the measure is presented. We are committed to making changes that align with the spirit of the PA and are supported by evidence. If a revision lacks evidence or contradicts guidance from the MUC List or CMS, we will communicate this back to the developers.

Furthermore, we are open to scheduling calls to discuss feedback in detail. Our aim is to work together to present information that truly reflects the spirit of the measure, ensuring that both the developer and steward feel comfortable with the outcome.