

Pre-Rulemaking Kick-off Post Webinar Questions Summary

Measure Submissions

- **Will candidate measures submitted prior to the May 10, 2024 deadline be eligible for program consideration beginning with calendar year 2025?**
 - All measures submitted to MERIT by the deadline of May 10, 2024 at 8pm ET, will be eligible for placement on the Measures Under Consideration (MUC) List. If a measure submission is placed on the MUC List it must also be reviewed under the Pre-Rulemaking Measure Review (PRMR) process managed by the consensus-based entity (CBE) prior to being considered for adoption into a CMS program for 2025. It is important to note that programs follow their own specific schedules for rulemaking and the implementation of measures based on program-specific requirements and processes.
- **CMS has indicated that there are gaps in measurement areas, but there is clearly a marked decrease in the number of measures being submitted based on the graph shown. What is CMS doing to reduce the burden on measure developers and facilitate the development of important measures?**
 - CMS's goal is to have high value measures in programs that drive improvements in health outcomes. For more information, please see the [Needs & Priorities Report](#), which shares program specific measure information and identifies needs based on their program-specific measure requirements. Also, there are resources about CMS agencywide priorities and initiatives like the [Meaningful Measures Initiative](#), which establishes measure priorities as well as the [Cascade of Meaningful Measures](#) framework which maps out CMS measures and help identify where there may be gaps, or where there may be too many quality measures in one area.

CMS continues to evaluate the gaps in program measure portfolios and also decreases the amount of measures (through measure removal or alignment) where there may be too many measures in one area.

CMS has also taken steps to alleviate the burden on measure developers submitting measures to the MUC List. In the last few pre-rulemaking cycles, CMS has decreased the number of mandatory MERIT submission fields and standardized the collection of measure information as much as possible.

- **Have the MERIT questions been changed to align with the evaluation criteria that are used during Pre-Rulemaking Measure Review (PRMR) review?**
 - MERIT aligns with PRMR evaluation criteria, when feasible and appropriate. Each year we update the MERIT questions based on evolving measure science and CMS priorities. These proposed updates undergo a comprehensive review from multiple parties, including the Partnership for Quality Measurement (PQM) team.

- **If we select a specific CMS program we think our measure meets gaps/needs for but that program reviews and feels it is not relevant for them, is there any process for other potentially relevant programs to look at the submitted measure and see if it is of interest to a second program? (beyond just checking multiple programs in MERIT portal)**
 - Yes, the measure could be reviewed and could be recommended for another program instead of the program it was originally submitted for. CMS would work with the measure submitter if a measure is identified as a good fit for another program. To note, this is not a common occurrence, but it is a possibility.

- **Since the MERIT portal mentions pasting as plain text, do you recommend no tables at all be included in the text boxes or just provide in the supplemental document?**
 - Text boxes will not allow the pasting of tables. Please submit all tables as supplemental documentation and add them as an attachment.

PRMR Process

- **Who will see the information that a submitter submits? Will PRMR committee members receive everything in MERIT?**
 - All of the information measure developers submit into MERIT will be shared with CMS program leads, as well as PRMR committee members and the public, verbatim or summarized in the preliminary assessments produced by PQM. This year, for the first time, the attachments submitted in MERIT will be shared alongside the MUC List when it is anticipated to be published, no later than December 1.

Measure Testing

- **If a measure is currently undergoing testing, but will be fully developed between the MERIT submission and the MUC List publication, is there an opportunity to update the MERIT submission?**
 - 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 Friday, May 10. There is no option for submitters to update measure testing information in MERIT once the submission period closes.

- **During the review process of a proposed quality measure, do you measure the burden or difficulty the measure will impose on providers?**
 - MERIT questions do capture information about potential burdens, such as data entry and data collection burden and modifications to provider workflows. Additionally, CMS programs evaluate measures for their individual potential burden against the programs' statutory requirements. Reviewing statutory requirements for a program can help minimize the burden for providers by clarifying expectations and reducing uncertainties. It will allow providers to streamline their processes, ensuring they meet necessary standards without unnecessary or redundant efforts.

- **Does revising a measure to include risk stratification/adjustment constitute a substantive change that would require resubmission to the MUC list (assuming there are no other changes)?**
 - Historically, risk adjusting or stratification for a previously unadjusted measure has been considered a substantive change. You can always reach out to Battelle at MMSsupport@battelle.org with questions about a measure's submission and that information can be shared with the CMS program of interest and they can help respond and provide guidance from their perspective.

eCQM

- **Where can I find more information about the standards that should be used to specify eCQM's submitted for consideration.**
 - You can find more information about those standards and the tools used for eCQMs in CMS programs on the [eCQI Resource Center](#). For more specific information on the standards and the code system versions used in eCQMs included in CMS quality programs for the 2025 reporting and performance period, you can review the [Electronic Clinical Quality Measures \(eCQMs\) Annual Update Pre-Publication Document](#).

- **Are the measures supposed to use the Quality Measures Implementation Guide (QMIG) if using FHIR?**
 - CMS highly encourages organizations submitting an eCQM for consideration by any CMS program to submit both (1) QDM-based specifications output from MAT and Bonnie and (2) FHIR-based specifications output from MADiE; MADiE currently supports [QI Core 4.1.1 \[hl7.org\]](#) for FHIR measures. In QDM, HQMF supports the structure of the measure. In FHIR, this correlates with the QMIG; the current version supported is [QMIG STU 3 \[hl7.org\]](#).

 - Please also [continue tracking](#) to the decommissioning of MAT and Bonnie and the requirement to migrate work to the new MADiE tool for QDM- and FHIR-based work.

- **How do we figure out if the data elements that are in defined fields in electronic sources align with United States Core Data for Interoperability (USCDI) v4 or USCDI+ Quality draft standard definitions?**
 - The guidance for this item in MERIT provides links where you can access this information. Please refer to the HealthIT.gov website for information about the [USCDI](#) and [USCDI+ Quality](#). To determine alignment, developers can compare the data elements used in their measure with those listed on the HealthIT.gov website.
- **If you are looking at measures to align with USCDI+ for Quality, are there any plans to work with ONC to have certification against this data set?**
 - Yes, CMS collaborates with ONC on the development and maintenance of standards that promote nationwide, interoperable data exchange, including the [United States Core Data for Interoperability \(USCDI\)](#) and the USCDI+ Quality domain.

Pre-Rulemaking Timeline

- **Can you explain a bit more about the time between when MERIT submissions are due and when the MUC List is posted? For example, what is happening during the review of candidate measures compared to the review of the MUC List?**
 - The process includes individual CMS program review of the measures and then compilation of the program's recommendations to create the draft MUC List. From there, the draft MUC List goes on to be reviewed by federal agencies such as CMS, all other Operating Divisions within HHS (e.g. CDC, NIH, AHRQ, etc), and the Office of Management and Budget (OMB). Because of the large amount of interested parties in other federal agencies to review and provide input, this process does take some time to complete and finalize before or on the December 1 deadline.