



COVID-19 Public Reporting Tip Sheet

The purpose of the tip sheet is to provide information to help home health agencies (HHAs) understand the Centers for Medicare & Medicaid Services’ (CMS) public reporting strategy for the HH QRP to account for CMS quality data submissions that were either optional or excepted due to the COVID-19 public health emergency (PHE). The impact on CMS’ Home Health Compare website refreshes are also outlined. This tip sheet serves as a follow-on document to the [HH QRP COVID-19 PHE Tip Sheet](#) published in July 2020, which provided practical guidance to address home health quality data submissions after July 1, 2020, once the temporary HH QRP exceptions from the COVID-19 PHE ended.



HH QRP and Public Reporting on Home Health Compare

Since 2003, CMS has publicly reported quality measures that relate to the care provided by HHAs across the country. Currently data for the quality of patient care measures and Patient Survey Star Ratings, which are reported on the Home Health Compare website, derive from three sources:

- Outcome and Assessment Information Set (OASIS).
- Consumer Assessment of Healthcare Providers and Systems (CAHPS®) Home Health Survey.
- Medicare claims data

Temporary HH QRP Exceptions Due to the COVID-19 PHE

The CMS [March 27, 2020 Medicare Learning Network \(MLN\) memo](#) outlined temporary changes to the HH QRP data submission requirements, due to the COVID-19 PHE, to assist HHAs while they directed resources toward caring for patients and ensuring the health and safety of patients and staff. CMS made optional and temporarily granted exception for providers from the submission of OASIS assessment and CAHPS® Home Health Survey data for the quarters detailed in Figure 1.

Figure 1. Quarters for Which Data Are Optional or Excepted

Quarter	CAHPS® and OASIS Data Submission
October 1, 2019–December 31, 2019 (Q4 2019)	Optional
January 1, 2020–March 31, 2020 (Q1 2020)	Excepted
April 1, 2020–June 30, 2020 (Q2 2020)	Excepted

Optional reporting and exceptions granted for the HH QRP data submission requirements ended **on June 30, 2020**.

Impact of Data Exceptions on Public Reporting

The HH QRP is a pay-for-reporting program, and CMS is statutorily required to publicly report the data. In the March 27, 2020, announcement, CMS indicated that data submission for Q4 2019 was optional and that any data submitted would be used for reporting purposes. Since data submission for Q4 2019 was strong, these data will be included in measure calculations for the Home Health Compare site refresh scheduled for October 2020.

The missing data for Q1 2020 and Q2 2020 will impact what is displayed on Home Health Compare; therefore, CMS developed a strategy to accommodate the excepted quarters of data.

CMS Strategy for Excepted Data

For Q1 2020 and Q2 2020, providers were excepted from data submissions. For this reason, CMS will hold the data constant (i.e., freeze the data) following the October 2020 refresh. The affected Compare site refreshes that were scheduled to contain CY 2020 COVID-19 data (Q1 2020, and Q2 2020) include:

- January 2021
- April 2021
- July 2021
- October 2021

After the October 2021 refresh, CMS plans to resume public reporting. Figure 2 provides a summary.

Figure 2. Summary of Data Refreshes

Quarter Refresh	Home Health Compare OASIS – Assessment-Based Measures Claims-Based Measures	Home Health Compare CAHPS®
October 2020	Normal refresh (includes Q4 2019 data)	Normal refresh (includes Q4 2019 data)
January 2021	Freeze	Freeze
April 2021	Freeze	Freeze
July 2021	Freeze	Freeze
October 2021	Freeze	Freeze
January 2022	Public reporting resumes*	Public reporting resumes*
April 2022	Normal refresh	Normal refresh

*To account for missing PHE-excepted data (Q1 2020 and Q2 2020) when public reporting resumes, any potential change in measure calculation methodology will be subject to notice-and-comment rulemaking.

Provider Reports

How will the data freeze affect provider reports?

- **Provider Preview Reports:**
 - The purpose of these reports is to give providers the opportunity to preview their OASIS quality measure results and Home Health CAHPS® survey results prior to public display on Home Health Compare.
 - Subsequent to the October 2020 refresh, CMS will not issue provider preview reports for those refreshes that continue to display the constant data.
- **Review and Correct Report:**
 - The purpose of this report is for providers have access to quality measure data prior to the data correction deadline for public reporting. It includes data from the most current quarter “open” for data correction and data from the previous three quarters “closed” for data correction (frozen data).
 - There will be no data available (open) to correct for Q1 2020 and Q2 2020.

When will the data return to normal?

The HH Compare site data will go back to its expected quarters of data displayed in April 2022.

How will OASIS submissions after July 1, 2020 be impacted by data that was excepted due to the COVID-19 PHE?

CMS requires OASIS submission as a condition of payment under the Home Health Prospective Payment System. Because of this requirement, HHAs were required to report to OASIS during the exception period. As a result, there is no impact on the submission process for the HH QRP data, but there are adjustments to exclude Q1 and Q2 2020 data from what is publicly reported.

Resources

- **For the Interim Final Rule with Comment Period (IFC-1):**
<https://www.federalregister.gov/documents/2020/04/06/2020-06990/medicare-and-medicaid-programs-policy-and-regulatory-revisions-in-response-to-the-covid-19-public>.
- **For the Interim Final Rule with Comment Period released April 30, 2020 (IFC-2):**
<https://www.federalregister.gov/documents/2020/05/08/2020-09608/medicare-and-medicaid-programs-basic-health-program-and-exchanges-additional-policy-and-regulatory>.
- **For the CMS Medicare Learning Network memo released March 27, 2020:**
<https://www.cms.gov/files/document/guidance-memo-exceptions-and-extensions-quality-reporting-and-value-based-purchasing-programs.pdf>.
- **For program guidance and information about the CMS response to COVID-19:**
<https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>.



- **For program guidance, updates, and announcements regarding the HH QRP, visit the Spotlight & Announcements web page:** <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/Spotlight-and-Announcements>.
- **For more information about the HH QRP, visit:** <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits>.
- **For Home Health Quality Reporting Data Submission Deadlines:** <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/Home-Health-Quality-Reporting-Data-Submission-Deadlines>.

Email questions to the Home Health Help Desk:
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