

Center for Clinical Standards and Quality/Quality, Safety & Oversight Group

Ref: QSO-21-05-ESRD

- DATE: December 4, 2020
- TO: CMS Locations, State Survey Agency Directors, Dialysis Providers
- FROM: Director Quality, Safety & Oversight Group

SUBJECT: FY2021 Quarter 1/Quarter 2 Dialysis Facility Report (DFR) - Update

Memorandum Summary

- On March 22, 2020, the Centers for Medicare & Medicaid Services (CMS) announced changes to data submission requirements for dialysis facilities in order to reduce data collection and reporting burden on providers responding to the COVID-19 pandemic.
- CMS waived data submission from January 1, 2020 through June 30, 2020 (Q1-Q2) for performance or payment programs. In addition, no data reflecting services provided January 1, 2020 through June 30, 2020 will be used in CMS's calculations for the Medicare quality reporting and value-based purchasing programs.
- Due to the waiver of data submission requirements and its potential impact on measure calculations, the Q1 and Q2 DFR distributions will be cancelled.

Background

On March 22, 2020, CMS announced relief for clinicians, providers, hospitals and facilities participating in Quality Reporting Programs in response to the 2019 Novel Coronavirus (COVID-19) pandemic by granting exceptions under certain Medicare quality reporting and value-based purchasing programs for providers and suppliers, including dialysis facilities. CMS granted waivers to data reporting requirements in order to reduce the data collection and reporting burden on providers responding to the COVID-19 pandemic. As part of this effort, CMS suspended data reporting requirements from January 1, 2020 through June 30, 2020 for dialysis facilities.

Each year, CMS releases individualized Dialysis Facility Reports highlighting certain clinical characteristics of a facility relative to other facilities in the state, ESRD Network, and across the United States (national average). The initial DFR is followed by three quarterly updates (Q1-December, Q2-March, Q3-June). The waiver of data submission requirements had an impact on the production of FY2021 Quarterly Dialysis Facility Reports (DFR), as this data remains the primary source for many of the measures included in the DFR. For this reason, CMS will **cancel the Q1 and Q2 DFR updates**, previously scheduled for release in December 2020 and March

2020, respectively. Please note that the quarterly DFR reports only includes updates for multiple intermediate outcomes (e.g. dialysis adequacy, vascular access, etc.), but does not include updates for mortality and hospitalization.

Discussion

The FY2021 DFR and Pre-Survey DFR Extract, released in September 2020, provide facilitylevel data through December 2019. In the absence of the Q1/Q2 updates to this release (data from January through June 2020), surveyors should continue to use comprehensive DFR reports to determine data driven focus areas when conducting survey activities for dialysis facilities. Additionally, infection control remains the focus of any survey conducted during the Public Health Emergency. On March 23, 2020, CMS issued the QSO 20-20-All memorandum, which introduced the focused infection control tool. Surveyors should continue to utilize the infection control tool as part of any survey that is conducted until further notice.

We will continue to monitor and analyze all available data reported during the waiver period to determine its impact on measure calculations for subsequent dialysis reports, e.g. FY 2022 DFR. We will release additional notice for these reports.

Resources:

Data Reporting Requirements Press Release (3/22/2020): <u>https://www.cms.gov/newsroom/press-releases/cms-announces-relief-clinicians-providers-hospitals-and-facilities-participating-quality-reporting</u>

Exceptions and Extensions for Quality Reporting Requirements Memo (3/27/2020): <u>https://www.cms.gov/files/document/guidance-memo-exceptions-and-extensions-quality-reporting-and-value-based-purchasing-programs.pdf</u>

QSO-20-All: Prioritization of Survey Activities + Infection Control Tool (3/23/2020): <u>https://www.cms.gov/files/document/qso-20-20-allpdf.pdf</u>

Contact: For any questions related to this notice, please contact the ESRD Team at <u>ESRDQuestions@cms.hhs.gov</u>.

Effective Date: Immediately. This policy should be communicated with all survey and certification staff, their managers and the State/CMS Locations within 30 days of this memorandum.

/s/ David R. Wright

cc: Survey and Operations Group Management