

## HOME HEALTH QUALITY REPORTING PROGRAM (HH QRP)



# COVID-19 Public Health Emergency (PHE) Tip Sheet

## The Home Health Quality Reporting Program (HH QRP)

Quality data for the HH QRP are collected and submitted using two methods:

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

### OASIS Requirements

Home Health Agencies (HHAs) are required to collect and report OASIS data for patients whose care is reimbursed by Medicare or Medicaid (including those in managed care). HHAs are not required to report OASIS data for patients that are prepartum, postpartum, under 18 years of age, or receiving only housekeeping/chore services and personal care services (64 FR32985).

### CAHPS® Home Health Survey Requirements

HHAs are required to collect 12 months of data using the CAHPS® Home Health Survey. The data collection period includes April 1 to March 31.

## HH QRP Exception and Extension Policy for Extraordinary Circumstances

The Centers for Medicare & Medicaid Services (CMS) recognizes that there are instances where an extraordinary or extenuating circumstance beyond the HHA's control (e.g., natural disasters) may delay or prevent submission of required data. CMS has developed an Exception and Extension for Extraordinary Circumstances policy, which has two parts:

- Provider-initiated requests for exception or extension for extraordinary circumstances.
- CMS-initiated waivers for exception or extension for extraordinary circumstances that are based on Federal Emergency Management Agency (FEMA)-designated natural disasters.



## Temporary HH QRP Exception Due to COVID-19 PHE

In the March 27, 2020, Medical Learning network (MLN) memo, CMS announced temporary relief for HHAs and other providers in QRPs in response to COVID-19 PHE. These temporary exceptions due to this PHE lifted the requirements to report data to assist HHAs while they directed their resources toward caring for patients and ensuring the health and safety of patients and staff.

Specific quarters for which HHAs are exempted from reporting of CAHPS® Home Health Survey and OASIS data for calendar years (CYs) 2019 and 2020 are listed below and **end on June 30, 2020**:

- October 1, 2019–December 31, 2019 (Q4 2019)
- January 1, 2020–March 31, 2020 (Q1 2020)
- April 1, 2020–June 30, 2020 (Q2 2020)

## What Happens When the HH QRP Exceptions Expire?

The temporary exception for HH quality reporting requirements **end on June 30, 2020**. **Starting on July 1, 2020**, HHAs are expected to resume timely quality data collection and submission of OASIS and CAHPS® Home Health Survey data.

### Data Submission After July 1, 2020

#### For CAHPS® Home Health Survey, what does that mean for CAHPS® data collection?

The CAHPS® Home Health Survey will be required for the third quarter of 2020 and onward. The Home Health Care Consumer Assessment of Healthcare Providers and Systems (HHCAHPS) requirements for the Annual Payment Update (APU) run from April through the following March. For the CY 2022 APU, HHAs are required to submit monthly lists to their HHCAHPS-approved survey vendors for the months of April 2020 through March 2021. Due to the COVID exceptions, agencies are not required to submit data for the second quarter of 2020, which is April 2020 through June 2020. The HHCAHPS-approved survey vendors are required to submit survey data on the third Thursday in the months of January, April, July, and December. The HHCAHPS-approved survey vendors are required to submit HHCAHPS survey data on July 16, 2020, and onward.



## **For OASIS and the HH QRP, which records should you submit?**

Starting with Q3 that begins July 1, 2020, CMS expects providers to report their quality data, which means that for all assessment time points with a **M0090 date of July 1, 2020, or later**, CMS expects the assessments to be submitted following the QRP requirements.

## **What is the submission deadline?**

CMS is waiving the 30-day OASIS submission requirement. Delayed submission is permitted during the PHE.

## **What CY 2020 HH QRP OASIS data will be used to meet HH QRP data reporting requirements that impact CY 2021 payments?**

The CY 2020 data used for meeting the HH QRP requirements include January 1, 2020 to June 30, 2020 however we exempted Q1 and Q2 of 2020 (January 1 to June 30, 2020) due to the COVID-19 PHE. This means even if you submit Q1 and Q2 2020, we will not include any of that data for purposes of calculating whether you meet the HH QRP requirements impacting CY 2021 payments.

## **Flexibilities (Waivers) Due to the PHE**

Since the PHE was declared, several other actions have been taken to provide temporary relief for HHAs. Below is a list of some of the relief provided to HHAs specific to OASIS:

- CMS is delaying the release of the updated version of OASIS needed to support the Transfer of Health (TOH) Information quality measures and new or revised Standardized Patient Assessment Data Elements (SPADES) to provide maximum flexibilities for providers of HHAs to respond to the COVID-19 PHE. The release of the updated version of the OASIS will be delayed until January 1 of the year that is at least 1 full calendar year after the end of the COVID-19 PHE.
- CMS is providing relief to HHAs on the timeframes related to OASIS transmission through the following: (1) extending the 5-day completion requirement for the comprehensive assessment to 30 days; and (2) waiving the 30-day OASIS submission requirement. Delayed submission is permitted during the PHE. We are now allowing 30 days for the completion of the comprehensive assessment. HHAs must submit OASIS data prior to submitting their final claim in order to receive Medicare payment.

*Note: Flexibility waivers will remain in place for the duration of the COVID-19 PHE.*

## Resources

**For more information about the delayed release of a revised OASIS, please refer to:**

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/Home-Health-Quality-Reporting-Training>.

**For more information about “Home Health Agencies: CMS Flexibilities to Fight COVID-19” including other waivers, please refer to:** <https://www.cms.gov/files/document/covid-home-health-agencies.pdf>.

**For the March 27, 2020 Medicare Learning Network memo regarding CMS guidance related to relaxed quality reporting requirements:** <https://www.cms.gov/files/document/guidance-memo-exceptions-and-extensions-quality-reporting-and-value-based-purchasing-programs.pdf>.

**The Interim Final Rule with Comment Period (IFC):** <https://www.cms.gov/files/document/covid-final-ifc.pdf>.

**The Interim Final Rule with Comment Period released April 30, 2020, (IFC-2):**

<https://www.cms.gov/files/document/covid-medicare-and-medicaid-ifc2.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>.

**COVID-19 Emergency Declaration Blanket Waivers for Health Care Providers:**

<https://www.cms.gov/files/document/summary-covid-19-emergency-declaration-waivers.pdf>.

**For HH program guidance, updates and announcements, visit the HH Spotlight & Announcements web page:**

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/Spotlight-and-Announcements>.

**For additional information about the OASIS assessment instrument and accompanying guidance manual:**

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/HHQIOASISUserManual>.

**Email questions to the HH Help Desk at:**  
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