

March 14, 2018

Dear Flex Coordinators,

For the past few years, the Medicare Rural Hospital Flexibility Grant Program (Flex) has required participation in the Medicare Beneficiary Quality Improvement Project (MBQIP) for Critical Access Hospitals (CAHs). As of February 2018, 1,332 CAHs have a signed Memorandum of Understanding (MOU), demonstrating commitment to MBQIP. In addition, of the 1,345 CAHs, 95% reported quality measures in at least two domains in the past year. Great job on all your hard work!

After seeing the progress made by all of our Flex partners and CAHs, FORHP has decided to continue a phased approach to achieving 100% reporting in all four domains.

Depending on the availability of appropriated funds and a decision that continued funding is in the best interest of the federal government, for the Federal Fiscal Year (FFY) 2019 (September 1, 2019 – August 31, 2020), CAHs must meet **three** criteria to be eligible for FFY 2019 Flex-funded activities:

- (1) A signed MOU to submit and share MBQIP data
- (2) Reported data on **at least one MBQIP Core measure, for at least one quarter, in at least three of the four quality domains, within a certain reporting period.**
- (3) A CAH must complete the appropriate Notices of Participation (NOPs) for “Public Reporting” and “Quality Improvement” as well as not opt to suppress their quality data from Hospital Compare. **(New)**

CAHs are highly encouraged to continue reporting as many measures as possible, regardless of what the minimum requirements are for the year.

We would appreciate feedback as to how we can make this a smooth process. Please contact your project officer and let us know of concerns or recommendations.

Thank you,

Sarah Young, Flex Program Coordinator, Hospital-State Division, FORHP

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## **Criteria for Eligibility in Flex Funds for CAHs, FFY 2019 (September 1, 2019 – August 31, 2020)**

Future Flex grant funding will depend on the availability of appropriated funds and a decision that continued funding is in the best interest of the federal government. The criteria for eligibility for FFY 2019 participation in Flex, based on the required participation in MBQIP activities, are outlined below. Please note that it is highly encouraged that CAHs consistently report data on as many measures as possible in all four domains. Also, due to variations in data availability and timing, the reporting period for EDTC is longer than for the other measures.

The minimum requirements to participate in Flex-funded activities in FFY 2019 (September 1, 2019 - August 31, 2020) include:

- (1) A CAH must have a signed MBQIP Memorandum of Understanding
- (2) A CAH must have reported data on at least one measure for at least one quarter within the reporting period listed below in at least **three of the four** [MBQIP Core Quality Domains](#). Data periods that will be used to determine eligibility are listed below:
  - Patient Safety/Inpatient
    - IMM-2: 3Q17 – 2Q18;
    - Antibiotic Stewardship; Submit calendar year 2017 NHSN Patient Safety Component Annual Facility Survey (**New this year**)
    - OP-27: Aggregate based on 4Q17 – 1Q18 (submitted annually, due May 15<sup>th</sup>)
    - ED-1 and ED-2 (**New this year**)
  - Patient Engagement (HCAHPS): 3Q17 - 2Q18
  - Care Transitions (EDTC): 1Q18 – 4Q18
  - Outpatient (OP-1-5, OP-18, 20-22): 3Q17 – 2Q18
    - OP-22: Calendar year 2017 (submitted annually, due May 15<sup>th</sup>)
    - OP-1, OP-4, OP-20, and OP-21: Will be included through Q1 2018 (after which they will no longer be available for reporting).
- (3) CAH must complete the appropriate Notices of Participation (NOPs) for “Public Reporting” and “Quality Improvement” as well as not opt to suppress their quality data from Hospital Compare. (**New this year**)

### **For CAHs that did not meet FFY2018 MBQIP Eligibility Requirements**

FORHP understands that certain circumstances hinder CAHs from meeting reporting requirements. Therefore, Flex Coordinators have the opportunity to request waivers for MBQIP participation requirements for CAHs deemed potentially ineligible. The designated state Flex award recipient should coordinate with the CAH to submit a waiver as part of the award recipient's **Funding Extension Progress Report under Attachment 5 - "MBQIP Participation Waivers"**. The criteria for waiving the penalty are listed below. A sample of FFY18's waiver can be found on TASC's website.

- Justifications for a waiver include:
  - CAHs who signed the Memorandum of Understanding between September 2017 thru August 2018 and are building capacity
  - CAHs who received CAH designation within the last year
  - CAHs with other extenuating circumstances
  - Questions on any exceptions not outlined above should be directed to your designated FORHP project officer
- Elements required on a waiver include:
  - CAH's CCN and CAH Name
  - Reason and situations each CAH faces for not being able to submit data on each MBQIP Quality Domain as well as other reasons/situations that do not apply to a particular domain
    - Patient Safety
    - Patient Engagement (HCAHPS)
    - Care Transitions (EDTC)
    - Outpatient (OP-1-5, OP-18, 20-22)
    - Other reasons
  - Steps towards reporting in the next year (Present – March 2019) for each MBQIP Quality Domain
  - (If applicable) Progress made since FY17's waiver/last year
  - Any documents that are relevant to the CAH
  - Signatures and dates of the Flex Coordinator and CAH representative

FORHP will review each waiver submitted and determine acceptable waivers on a case-by-case basis. CAHs with waivers that are not approved will not be eligible for Flex funds or participate in Flex-funded activities. FORHP will contact each state Flex Coordinator after the release of the Notice of Award.

## Frequently Asked Questions

- **Inaccurate information:** CAHs in my state indicate they reported data within the reporting periods, but were deemed ineligible for Flex funds. How do I fix this situation?
  - If a CAH reported data within the reporting periods listed above for at least two of the four domains, then please submit documentation to your designated FORHP project officer that demonstrates your CAH submitted MBQIP measures within the reporting period and FORHP will review the documents
  - Example of acceptable documentation:
    - QualityNet Case Status Summary Report
    - HCAHPS vendor survey submission
- **Non-reporting CAHs:** CAHs in my state do not want to submit data on any of the measures under the MBQIP Quality Domains or submit a waiver. What happens now?
  - If CAHs do not want to submit data on any MBQIP core measures, then they are not eligible to receive any Flex funds or participate in Flex-funded activities until they opt-in to MBQIP with a signed MOU and submit data on MBQIP measures. State Flex programs may provide technical assistance to assess needs and encourage MBQIP reporting and for information-sharing that does not add additional costs to the state Flex program (such as an email listserv, recorded webinar, or conference presentation).
- **Participating in MBQIP:** What if a CAH in my state opted out of MBQIP, but would like to opt-in to MBQIP again?
  - FORHP will need a new signed [Memorandum of Understanding](#) and the CAH must submit data on MBQIP core measures. Please send the MOU to your FORHP designated project officer.
- **Waivers:**
  - CAHs in my state requested a waiver last year, can they submit one again?
    - Yes, all CAHs can submit a waiver to be reviewed by FORHP as long as it adheres to the waiver requirements
  - FFY 2017 waivers for CAHs in my state were accepted, which eligibility requirement do they adhere to?
    - All CAHs, regardless of if they have had a waiver in the past, will be held to the most current MBQIP reporting requirements
- **Complete Notice of Participations (NOPs):** For more information, please review [MBQIP Quality Reporting Guide](#) for a step-by-step instruction for completing the NOPs.
- **Future reporting requirements:** Will the requirements for participation in MBQIP change for September 2020 and beyond?
  - Yes, FORHP will implement a phased approach when determining the minimum level of reporting requirements in MBQIP required for participation in Flex-funded activities. Every year, FORHP will increase the MBQIP requirements for CAHs with the goal of increased reporting and improved quality of care. More details concerning participation criteria will be forthcoming from FORHP. Please contact your designated FORHP project officer if you have any questions or concerns.