

Revisions Crosswalk (Form CMS-10540): OMB \_\_\_\_\_ (05/27/2015)

Issue #	Page #	Section	Action to be performed	Changes to the Template	Reason for the Change
1.	All	All	Adjust section and element numbers	<ul style="list-style-type: none"> <li>Adjust section numbers/letters and element numbers to be sequential after the addition and replacement of previous sections and elements.</li> </ul>	Adjusted so that contents are labelled sequentially.
2.	All	All	Combine forms into a single form	<ul style="list-style-type: none"> <li>Combine two forms into a single form</li> </ul>	Consolidated to reduce the collection of duplicative information based on technical expert panel recommendations
3.	1	Part A - New or Continuing QIS Submission	Add new Part	<ul style="list-style-type: none"> <li>Add Part A (to indicate whether issuer is submitting a New QIS, a New QIS After Discontinuing a QIS Submitted During the Most Recent QHP Application Period, a Continuing a QIS with No Modifications, or a Continuing a QIS with Modifications)</li> </ul>	Added because it is necessary to collect this information so that issuers know which parts of the form to complete.
4.	2	Background Information Part B – Issuer Information	Add instructional clarification	<ul style="list-style-type: none"> <li>Add header “Background Information”</li> <li>Add explanation that the fields in Part B are required, but will not be scored as part of the QIS evaluation.</li> </ul>	Added to clarify that this section is for background information and issuers must complete the section but it will not be scored.
5.	2	Part B – Issuer Information	Add descriptions to element names	<ul style="list-style-type: none"> <li>Add “Issuer” in front of State</li> <li>Add “QHP” in front of other issuer information for elements 2-13</li> </ul>	Added to clarify specific information to be provided.
6.	2	Part B – Issuer Information, Element #14	Add new element	<ul style="list-style-type: none"> <li>Add element #14 “Date Issuer Began Offering Coverage Through the Marketplace”</li> </ul>	Added because it is necessary to collect this information; only issuers that have been operating on the Marketplace for two consecutive years are required to comply with the QIS certification standard.
7.	2	Part B – Issuer Information, Element #15	Move element to different section	<ul style="list-style-type: none"> <li>Move element #15 “Current Payment Model(s) Description” from former Part D to new Part B.</li> </ul>	Moved this element to previous section for clarity.

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8.	2-3	Part C – Data Sources Used for Problem Identification and Monitoring Progress	Add new Part	<ul style="list-style-type: none"> <li>• Add “Part C. Data Sources Used for Problem Identification and Monitoring Progress” (with explanation that the field is required, but will not be scored as part of the QIS evaluation)</li> <li>• Add element #16 “Data Sources” with instructions and list of potential data sources</li> </ul>	Added to understand what data issuers are using to inform their QIS rationale. This section will not be scored.
9.	3	QIS Implementation Plan Section	Add section header and instructions	<ul style="list-style-type: none"> <li>• Add section header “QIS Implementation Plan Section” and instructions for issuers to retain a copy of completed QIS Implementation Plan for future use</li> </ul>	Added to distinguish the upcoming section and remind issuers to retain copies of their submissions.
10.	3	Part D – QIS Summary	Revise section title	<ul style="list-style-type: none"> <li>• Delete “Part B. Strategy Description”</li> <li>• Replace with “Part D. QIS Summary”</li> </ul>	Renamed section title and adjusted alphanumeric label based on addition of previous sections.
11.	All	All	Revise language	<ul style="list-style-type: none"> <li>• Delete “Strategy”</li> <li>• Replace with “QIS”</li> </ul>	Replaced to consistently use “QIS” acronym in place of spelling out the words “strategy” or “quality improvement strategy”
12.	3	Element #17 – QIS Title	Increase character limit	Change character limit from 50 to 100	Increased character limit to allow issuers more flexibility for the title of their QIS.

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13.	3	Element #18 – QIS Description	Revise instructions	<ul style="list-style-type: none"> <li>• Delete: “Provide a brief description of the quality improvement strategy. The description must include:               <ul style="list-style-type: none"> <li>○ Market-based incentive strategy type (see item 14 below)</li> <li>○ QIS topic area (see item 15 below)</li> <li>○ Overall goal of the strategy</li> <li>○ If the strategy is new/not yet implement; or if it is an existing strategy that the QHP issuer currently has in place”</li> </ul> </li> <li>• Replace with: “Provide a brief summary description of the QIS. The description must include information about all of the following:               <ul style="list-style-type: none"> <li>○ Market-based incentive type(s) (see Element 19);</li> <li>○ QIS topic area(s) (see Element 20); and</li> <li>○ The overall goal(s) of the QIS (no more than two), which should be labeled Goal 1 and Goal 2 (Note: Measures described in Element 24 should be linked to these goals).</li> <li>○ Indicate if this is a strategy that the issuer currently has in place for its Marketplace product line and/or for other product lines.</li> <li>○ Indicate if this strategy is a part of a broader initiative at the state or regional level.</li> <li>○ If the strategy is part of a state initiative, check “yes” or “no” to indicate whether participation in the initiative is mandatory.”</li> </ul> </li> </ul>	Revised instructions for added clarity. (Editorial, non-substantive changes.). Removed some information to reduce redundancies.
14.	3	Element #18	Increase character limit	<ul style="list-style-type: none"> <li>• Change character limit from 500 to 1,000</li> </ul>	Increased character limit to allow issuers more flexibility for the description of their QIS

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15.	4	Part E. QIS Requirements	Add clarifying instructions	<ul style="list-style-type: none"> <li>• Add “These fields will be scored as part of the QIS evaluation. Elements marked “must pass” are elements that must receive a “meets” score during the QIS evaluation. If any “must pass” elements are scored as “does not meet” in the QIS evaluation, the issuer must revise its Implementation Plan and submit it for re-review.”</li> </ul>	Added instructions to explain that this section contains the fields that will be scored for QIS evaluation and a high level summary of the scoring process.
16.	4	Element #19 - Market-Based Incentive Type(s)	Revise instructions	<ul style="list-style-type: none"> <li>• Delete “Check at least one market-based incentive type (provider or enrollee) and sub type the strategy will, or already includes, in the strategy. If “other” is selected, briefly describe the type in the space provided. (check all that apply)”</li> <li>• Replace with “Check the type of market-based incentive(s) that are used by the QIS. (Check all that apply.) For each market-based incentive type, check the sub-type the QIS includes. (Check all that apply.) If “Other” is selected, briefly describe the market-based incentive sub-type in the space provided.”</li> <li>• Add “Must Pass”</li> <li>• Add “Market-based” in front of “incentives”</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. (Editorial, non-substantive changes.)
17.	4	Element #20 – Topic Area Selection	Revise instructions	<ul style="list-style-type: none"> <li>• Delete “Check the box for reducing health and health care disparities along with an additional topic area to focus the strategy, as defined in the Affordable Care Act.(check all that apply)</li> <li>• Replace with “Check box(es) for the topic area(s) this QIS addresses, as defined in the Affordable Care Act. (Check all that apply.) *Implementation of activities to reduce health and health care disparities is required. It can be selected as a Topic Area or integrated into relevant Activities (see 23c).”</li> <li>• Add “Must Pass”</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. Clarified that health and health care disparities can be addressed through a different topic area and does not need to be selected individually. (Editorial, non-substantive changes.)

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18.	4-5	Element #20 – Topic Area Selection	Revise checklist	<ul style="list-style-type: none"> <li>• Delete: <ul style="list-style-type: none"> <li><input type="checkbox"/> Reduce health and health care disparities (required)</li> <li><input type="checkbox"/> Improve health outcomes</li> <li><input type="checkbox"/> Reduce readmissions</li> <li><input type="checkbox"/> Improve patient safety</li> <li><input type="checkbox"/> Implement wellness and health promotion activities</li> </ul> </li> <li>• Replace with: <ul style="list-style-type: none"> <li><input type="checkbox"/> Implementation of activities for improving health outcomes</li> <li><input type="checkbox"/> Implementation of activities to prevent hospital readmissions</li> <li><input type="checkbox"/> Implementation of activities to improve patient safety and reduce medical errors</li> <li><input type="checkbox"/> Implementation of wellness and health promotion activities</li> <li><input type="checkbox"/> Implementation of activities to reduce health and health care disparities (if this topic area is not selected, describe how your implementation activities relate to health and health care disparities in 23c.)</li> </ul> </li> </ul>	Revised checklist language to match the legislative language and clarify what information issuers must submit for this element. (Editorial, non-substantive changes.)
19.	5	Part E – QIS Requirements	Delete former Element #17 – Reducing Health and Health Care Disparities	<ul style="list-style-type: none"> <li>• Delete former Element #17 – Reducing Health and Health Care Disparities</li> </ul>	Deleted this element because it is now covered by new Element #20 – Topic Area Selection
20.	5	Element #21 Targets all Health Plans Offered Through the Marketplace (Must Pass)	Revise element name and instructions	<ul style="list-style-type: none"> <li>• Delete QHPs</li> <li>• Replace with Health Plans</li> </ul>	Replaced QHP with Health Plans to clarify that QIS submissions will apply to plans not yet certified as QHPs.

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21.	5	Element #21 Targets all Health Plans Offered Through the Marketplace (Must Pass)	Revise instructions	<ul style="list-style-type: none"> <li>• Add “Must Pass”</li> <li>• Delete “Check “yes” if all QHPs are covered in the strategy proposed in this template. Check “no” if the strategy covers a subset of all the QHP issuer’s QHPs. In the space provided, specify the Standard Component IDs (SCIDs) for all QHPs to which the strategy applies. Each QHP has a unique SCID. Check the appropriate boxes to indicate the relevant product types and categories of coverage for which the strategy applies and that correspond to the Standard Component IDs. (check all that apply)”</li> <li>• Replace with “21a - Check “All health plans” if the QIS applies to all health plans included in the current QHP Application and Certification process. Check “Subset of health plans” if the QIS covers a subset of the issuer’s health plans.* *Additional QIS Implementation Plan(s) must be submitted for health plans not covered by this QIS. 21b – Indicate the relevant product types to which the QIS applies. (Check all that apply.) 21c – In the space provided, specify all health plans covered by the QIS by listing each Plan’s 14-digit unique HIOS Plan ID (Standard Component ID [SCID]). Indicate if each one is a new or existing health plan.”</li> </ul>	Revised instructions to provide more detail around the submission of information for this element and how issuers must indicate which QIS submissions apply to which health plans it offers.
22.	5-6	Element #21 Targets all Health Plans Offered Through the Marketplace (Must Pass)	Revise checklist language	<ul style="list-style-type: none"> <li>• Revise checklist to spell out acronyms for product types and provide clearer direction on the information being requested</li> <li>• Add the collection of HIOS plan IDs (SCIDs) and indication of “new” or “existing” health plans for each health plan that issuer is submitting QIS for</li> </ul>	Revised checklists to provide more detail around the submission of information for this element and how issuers must indicate which QIS submissions apply to which health plans it offers.

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23.	6	Element #22 – Rationale for QIS	Revise element name and instructions	<ul style="list-style-type: none"> <li>• Add “Must Pass”</li> <li>• Delete “Provide a rationale that addresses 1) the needs of its current enrollee population; and 2) health and health care disparities within the context of the selected topic area(s).”</li> <li>• Replace with “Provide a rationale for the QIS that addresses all of the following criteria: 22a – How will the QIS address the needs of the current Marketplace population? 22b – If health and health care disparities is not one of the topic areas selected (Element 20), how will the QIS address health and health care disparities?”</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. (Editorial, non-substantive changes.)
24.	6	Element #22 – Rationale for QIS	Increase character limit	<ul style="list-style-type: none"> <li>• Increase character limit from 500 total to 1,000 for each of two rationales in this element (22a and 22b)</li> </ul>	Revised based on technical expert panel feedback that 500 characters was insufficient for issuers to provide adequate information on this element.

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25.	7	Element #23 – Activity(ies) that Will Be Conducted to Implement the QIS	Revise instructions	<ul style="list-style-type: none"> <li>• Add “Must Pass”</li> <li>• Revise element name from “Activity(ies) Designed to Meet Strategy Performance Targets” to “Activity(ies) that Will Be Conducted to Implement the QIS (Must Pass)”</li> <li>• Delete “Provide information on how each activity will: <ul style="list-style-type: none"> <li>○ Be tied to receiving the market-based incentive</li> <li>○ Relates to the selected topic area(s) (see item 15)</li> <li>○ Will target health and health care disparities (see item 16)</li> <li>○ Drive progress in the performance targets related to selected quality measures (see item 20)</li> </ul> </li> </ul> <p>Replace with</p> <ul style="list-style-type: none"> <li>• “List the activities implemented to achieve the identified goals. Describe how the activities advance the QIS as it relates to each of the following:” <ul style="list-style-type: none"> <li>○ 23a – Market-based incentive selected (see Element 19);</li> <li>○ (1,000 character limit)</li> <li>○ 23b –Topic area(s) selected (see Element 20); and</li> <li>○ 23c – Health and health care disparities (if not selected as a separate topic area in Element 20).</li> </ul> </li> <li>• Add “List the Activities”</li> <li>• Add 23a: “Describe how the activities relate to the selected market-based incentive;”</li> <li>• Add 23b: “Describe how the activities relate to the selected topic area(s);” and</li> <li>• Add 23c: “Describe how the activities relate to health and health care disparities (if not selected as a topic area).”</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. (Editorial, non-substantive changes.)



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26.	7	Element #23 – Activity(ies) that Will Be Conducted to Implement the QIS	Decrease character limit	<ul style="list-style-type: none"> <li>Decrease character limit from 4,000 to 3,000 total for this element (1,000 characters each for 23a, 23b, and 23c)</li> </ul>	Decreased character limit based on feedback that 1,000 characters each would be adequate for issuers to provide information for 23a, 23b, and 23c.
27.	7-10	Element #24 – Goal(s), Measure(s), and Performance Target(s) to Monitor QIS Progress	Revise instructions	<ul style="list-style-type: none"> <li>Add “Must Pass”</li> <li>Add clarifying language and revised structure to specify the type of information issuers must provide for the measures used to track progress against the goals identified in element #18.</li> <li>Add space for issuers to provide information on measures regarding multiple goals.</li> <li>Revise instructional language for providing measure name, description, baseline results, performance period, and performance target.</li> </ul>	Restructured and added space for multiple goals/measures, because some issuers may provide information for more than one goal in their QIS (though they are only required to have one). Primarily structural, non-substantive revisions (“spreading out” the information for clarity and organization).
28.	10	Element #25 – Timeline for Implementing the QIS	Revise instructions	<ul style="list-style-type: none"> <li>Delete “Provide the start date for implementation of strategy and defined milestones, including implementation of activities and measurement updates.</li> <li>Replace with “Provide information regarding the following criteria: 25a – The start date for QIS implementation; and 25b – Dates for defined milestones (e.g., when updated measure results will be available to assess progress).</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. (Editorial, non-substantive changes.)
29.	10	Element #25 – Timeline for Implementing the QIS	Decrease character limit	Decrease character limit from 1,000 to 100.	Decreased based on revised instructions and updated fields, which clarify that narrative detail is not necessary. Also, reduced based on feedback that issuers would only need 100 character to provide this information.

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30.	11	Element #26 – Risk Assessment	Revise element name and instructions	<ul style="list-style-type: none"> <li>• Change element name from “Anticipated Barrier(s) and Mitigation Activities” to “Risk Assessment”</li> <li>• Delete “List any known or anticipated barriers in implementing strategy activities. For each barrier identified, describe the mitigation activities that are incorporated into the strategy.”</li> <li>• Replace with “Provide information regarding anticipated barrier(s) and mitigation activities 26a – List any known or anticipated barriers in implementing QIS activities; and 26b – For each barrier identified, describe the mitigation activities that will be incorporated into the QIS if needed.”</li> <li>• Add 1,500 character limit (each) for 26a and 26b</li> </ul>	Revised instructions to clarify what information issuers must submit for this element. (Editorial, non-substantive changes.) Provided specific character limit in response to feedback that the responses to this element should be limited.
31.	11	QIS Progress Report – Part F. Progress Report Summary	Change name and add introductory instructions	<ul style="list-style-type: none"> <li>• Delete “Strategy Progress”</li> <li>• Replace with “Progress Report Summary”</li> <li>• Add “These fields will be scored as part of the QIS evaluation. Elements marked “must pass” are elements that must receive a “meets” during the QIS evaluation. If any “must pass” elements are scored as “does not meet” in the QIS evaluation, the issuer must revise its Progress Report and submit it for re-review.”</li> </ul>	Added to clarify the purpose of the section and that the fields in this section will be scored.
32.	11	Formerly Reporting Template Element #14	Move element	<ul style="list-style-type: none"> <li>• Remove “Continue Implementing Current Strategy or Submitting a New Strategy for Approval”</li> </ul>	Removed because this information is now requested in Part A, Element #1.
33.	11-12	Formerly Reporting Template Element #15	Move element	<ul style="list-style-type: none"> <li>• Remove “Activities Related to Implementing Strategy”</li> </ul>	Removed because this information is now requested in Part E, Element #23.

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34.	12	Element #27 - Addition of Health Plans to the Issuer's QIS	New element	<ul style="list-style-type: none"> <li>• Add "Addition of Health Plans to the Issuer's QIS. 27a – Check "Add health plan(s)" if the issuer is adding health plans to its existing QIS. Check "No additional health plans" if the issuer is not adding any health plans to its existing QIS. 27b – If "Add health plan(s)" was selected, list all new health plans and provide each plan's 14-digit unique HIOS Plan ID (Standard Component ID). Select "Not Applicable" if no new health plans were included.</li> </ul>	Added because it is necessary to collect this information in subsequent years as part of issuer's Progress Report to verify whether the portfolio of QHPs changed since the previous submission since all QHPs must be covered by a QIS.
35.	12	Element #28 - QIS Modifications	New element	<ul style="list-style-type: none"> <li>• Add "28a. If "Continuing a QIS with Modifications" was selected in Element 1, please indicate what type of modification the issuer is making to its QIS. (Check all that apply.) If "Continuing a QIS with Modifications" was not selected in Element 1, check "Not Applicable." 28b. Provide a justification and brief description of the modification(s) selected in criterion 28a. Check "Not Applicable" if no modifications were/will be made.</li> </ul>	Added because it is necessary to collect this information in subsequent years as part of issuer's Progress Report to understand whether modifications are being implemented in the following year. An issuer does not need to resubmit an Implementation Plan if it is making minimal modifications; thus the reason for putting this in the Progress Report.
36.	13-14	Element #29 – Analyze Progress Using Baseline Data, as Documented in Implementation Plan	Revise instructions and structure	<ul style="list-style-type: none"> <li>• Add clarifying language and revised structure to specify the type of information issuers must provide for reporting progress against goals using the measures identified in their Implementation Plans.</li> <li>• Add space for issuers to provide information on progress regarding multiple goals.</li> <li>• Revise instructional language for providing progress analysis.</li> </ul>	Restructured and added space for multiple goals/measures, because some issuers may provide information for more than one goal in their QIS (though they are only required to have one). Primarily structural, non-substantive revisions ("spreading out" the information for clarity and organization).

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37.	14	Element #30 – Summary of Progress	New element	<ul style="list-style-type: none"> <li>• Add “30a -- Summary of progress, including reasons why progress was or was not made toward the performance target(s) documented in Element 24. Include a description of activities that led to the outcome. If applicable, indicate whether the information provided here affects the decision to modify or change the QIS.</li> </ul>	Added to collect summary information on why an issuer did or did not achieve its goal(s) in subsequent years as part of issuer’s Progress Report.
38.	15	Element #31 – Barriers	Revise instructions	<ul style="list-style-type: none"> <li>• Delete “Challenges” from element name</li> <li>• Delete “Indicate if barriers were encountered when implementing the strategy. (Check box)”</li> <li>• Add “31a – Check the appropriate box to indicate if barriers were encountered when implementing the QIS. 31b – Check the appropriate box to indicate if there were problems meeting timelines. 31c – If “Yes” was selected in 31a or 31b, describe the barriers and/or problems in implementing the QIS or meeting timelines. If “No” was selected in 31a or 31b, select “Not Applicable.””</li> </ul>	Revised instructions to clarify what information issuers should submit for this element. (Editorial, non-substantive changes.)
39.	15	Element #32 – Mitigation Activities	Revise instructions	<ul style="list-style-type: none"> <li>• Delete “to address Barriers Encountered” from element name</li> <li>• Delete “Describe the barriers and the implementation of mitigation activities implemented to address each of the barriers, as well as the result(s) of the mitigation strategy.”</li> <li>• Add “32a – If “Yes” was selected in 31a or 31b, describe the mitigation activities implemented to address each barrier or problem in meeting the timeline. Also, describe the result(s) of the mitigation activities. If “No” was selected in 31a and 31b, select “Not Applicable.””</li> </ul>	Revised instructions to clarify what information issuers should submit for this element. (Editorial, non-substantive changes.)