

## Crosswalk for Changes to the Quality Improvement Strategy (QIS) Implementation Plan and Progress Report Form (CMS-10540)

The following table contains the list of changes made to the proposed QIS Implementation Plan and Progress Report form for the 2020 Plan Year.

Issue #	Page #	Section	Action to be Performed	Changes to the QIS Form	Reason for the Change
1.	All	All	Revise language	<ul style="list-style-type: none"> <li>Make minor language changes throughout.</li> </ul>	To improve clarity and readability and improve consistency with updated Agency language.
2.	1	Element #1 ( <i>Type of QIS Submission</i> )	Add new option	<ul style="list-style-type: none"> <li>Add option “Discontinuing a QIS Submitted during a prior Qualified Health Plan (QHP) Application Period” to Part A.</li> </ul>	To improve clarity of submission type.
3.	2	Part A – New, Discontinuing, or Continuing QIS Submission	Move Element to different section	<ul style="list-style-type: none"> <li>Move former Element #21 (<i>Targets All Health Plans and Product Types Offered Through an Exchange</i>) from former Part E to Part A.</li> </ul>	To improve clarity and readability.
4.	2	Criterion #2a: Targets All Health Plans and Product Types Offered Through an Exchange	Add footnote to clarify requirements	<ul style="list-style-type: none"> <li>Add footnote in new Criterion #2a: “An issuer that previously covered all eligible QHPs with a single QIS may choose to cover a subset of QHPs with its existing QIS in subsequent years, but must submit an additional QIS form(s) to cover its remaining eligible QHPs. Similarly, an issuer that previously covered subsets of its eligible QHPs with different quality improvement strategies may discontinue one or more of its strategies by submitting QIS forms to close them out. The issuer must also ensure all eligible QHPs are covered by an existing or new QIS.”</li> </ul>	To prevent user confusion and errors.

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5.	N/A	Part A – New or Continuing QIS Submission	Modify former Element #21 (new Element #2)—remove former Criterion #21b	<ul style="list-style-type: none"> <li>Remove former Criterion #21b: “In the space provided, specify all eligible QHPs covered by the QIS by listing each plan’s unique 14-digit HIOS Plan ID (Standard Component ID [SCID]). Indicate if each one is a new or existing eligible QHP. For initial submissions, specify all eligible QHPs covered by the QIS. To update a prior QIS submission by adding or removing SCIDs, use Element #27. Note: Please list additional health plans covered by the QIS on pages 26 and 27.”</li> </ul>	To prevent user confusion and errors, former Element #21 was modified to remove former Criterion #21b, which addressed the collection of SCIDs. CMS has alternate methods to check SCIDs for compliance.
6.	3	Part B – Issuer Information	Add clarifying instructions	<ul style="list-style-type: none"> <li>Add clarifying language, “Issuers may update the information in Part B from year to year, as needed” to instructions in Part B.</li> </ul>	To prevent user confusion and errors.
7.	4	Element #16: <i>(Current Payment Model(s) Description)</i>	Modify Element	<ul style="list-style-type: none"> <li>Add clarifying language, “Provide the percentage of payments in each payment model category used by the issuer across its Exchange product line,” to Element #16 <i>(Current Payment Model(s) Description)</i>.</li> <li>Add boxes to capture percentage of each payment model type.</li> <li>Add footnote to clarify how to calculate the percentage of payments.</li> </ul>	To prevent user confusion and errors.
8.	5	Part C – Data Sources Used for Goal Identification and Monitoring Progress	Add clarifying instructions	<ul style="list-style-type: none"> <li>Add “Issuers may update the information in Part C from year to year, as needed” to instructions in Part C.</li> </ul>	To prevent user confusion and errors.
9.	7	Element #19: <i>(QIS Description)</i>	Revise language	<ul style="list-style-type: none"> <li>Delete “Measures described in Element 24 should be linked to these goals.”</li> <li>Replace with “The topic area(s) selected in Element 21 and the measures described in Element 24 should be linked to these goals.”</li> </ul>	To improve clarity and readability.
10.	10	Element #22: <i>(Rationale for QIS)</i>	Revise language	<ul style="list-style-type: none"> <li>Modify language to say, “Provide a rationale for the QIS that describes the issuer’s current QHP enrollee populations and how the QIS will address the needs of the current QHP enrollee population(s).”</li> </ul>	To improve clarity and readability.

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11.	10	Element #22 ( <i>Rationale for QIS</i> )	Increase character limit	<ul style="list-style-type: none"> <li>Increase character limit from 1,000 characters to 1,500 characters.</li> </ul>	As a response to issuer feedback, the character limit was increased in Element #22.
12.	10-11	Element #23 ( <i>Activity(ies) that Will Be Conducted to Implement the QIS</i> )	Increase character limit	<ul style="list-style-type: none"> <li>Increase character limit from 1,000 characters to 1,500 characters.</li> </ul>	As a response to issuer feedback, the character limit was increased in Element #23.
13.	12	Element #23 ( <i>Activity(ies) that Will Be Conducted to Implement the QIS</i> )	Revise language	<ul style="list-style-type: none"> <li>Modify language to say, “If the issuer did not choose health and health care disparities as a topic area in Element #21, but the QIS does include activities related to addressing health and health care disparities, describe the activities below. If (1) health and health care disparities is one of the topic areas selected in Element #21; OR (2) health and health care disparities are not addressed in this QIS, check <input type="checkbox"/> Not Applicable.”</li> </ul>	To improve clarity and readability.
14.	11-16	Element #24 ( <i>Goal(s), Measure(s), and Performance Target(s) to Monitor QIS Progress</i> )	Revise language	<ul style="list-style-type: none"> <li>Modify language to say, “Baseline Assessment. Provide the baseline results by calculating the rate and providing the associated numerator and denominator, if applicable.”</li> <li>Remove “Not Applicable” checkboxes from questions regarding National Quality Forum (NQF) endorsement.</li> <li>Add language: “If the measure is not a rate, but another data point, enter the number in the space provided.”</li> <li>Add field to capture Data Point.</li> </ul>	To improve clarity and readability and to prevent user error and confusion.
15.	18	Element #26 ( <i>Risk Assessment</i> )	Revise language and add a text box	<ul style="list-style-type: none"> <li>Add language: “If no barriers were identified, describe how you assessed risk.”</li> <li>Add text box to capture description.</li> </ul>	To improve clarity and readability.

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16.	18	Part E. QIS Requirements	Add clarifying instructions	Add: <ul style="list-style-type: none"> <li>• If “New QIS with No Previous QIS submission,” STOP HERE.</li> <li>• If “New QIS after Discontinuing,” STOP HERE.</li> <li>• If “Discontinuing a QIS,” SKIP to page 21 (Part G. Progress Report Summary).</li> <li>• If “Continuing a QIS with Modifications,” continue to next page 19 (Part F. Modification Summary).</li> <li>• If “Continuing a QIS with No Modifications,” SKIP to page 21 (Part G. Progress Report Summary).</li> </ul>	To improve clarity and prevent user confusion and errors.
17.	N/A	Element #27 <i>(Addition of QHPs to the Issuer’s QIS)</i>	Remove Element	<ul style="list-style-type: none"> <li>• Remove Element #27 <i>(Addition of QHPs to the Issuer’s QIS)</i></li> </ul>	As a response to issuer feedback, Element #27 was removed because it addresses the collection of SCIDs.
18.	N/A	Element #28 <i>(QIS Modifications)</i>	Remove Element	<ul style="list-style-type: none"> <li>• Remove Element #28 <i>(QIS Modifications)</i></li> </ul>	Element #28 was removed to eliminate redundancies.
19.	19-20	Part F: QIS Modification Summary	Add Part	<ul style="list-style-type: none"> <li>• Add Part F: QIS Modification Summary, including Element #27 <i>(Modifying Goals, Measures, and Activities)</i> and Element #28 <i>(Modifying Product Types)</i></li> </ul>	Added elements to improve clarity and prevent user confusion and error.
20.	20	Element #28 <i>(Modifying Product Types)</i>	Change radio buttons to checkboxes	<ul style="list-style-type: none"> <li>• Modify Element to have checkboxes, so issuers can simultaneously select “Add” and “Remove” product types.</li> </ul>	To improve clarity and readability.
21.	20-24	Element #29 <i>(Analyze Progress Using Baseline Data, as Documented in the Implementation Plan)</i>	Revise language	<ul style="list-style-type: none"> <li>• Modify language in Criterion #29d to say, “Restate the baseline results from Criterion 24c of your most recent QIS submission, including the rate and associated numerator and denominator, if applicable.”</li> <li>• Add language “If the measure is not a rate, but another data point, enter the number in the space provided.”</li> <li>• Add field to capture data point.</li> </ul>	To prevent user confusion and errors.

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22.	25	Element #30 ( <i>Summary of Progress</i> )	Revise language	<ul style="list-style-type: none"> <li>Modify language to say, “Indicate 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, and, if applicable, indicate whether the information provided here affects the decision to modify the QIS (Part F).”</li> <li>Add language: “If the issuer selected “Discontinuing a QIS Submitted During a Prior QHP Application Period” in Element 1, provide the rationale for discontinuing the QIS.”</li> <li>Add language: “If applicable, provide information about changes made based on Post-certification Assessment (PCA) Reports from the previous year.”</li> </ul>	To improve clarity and readability.
23.	25	Element #30 ( <i>Summary of Progress</i> )	Increase character limit	<ul style="list-style-type: none"> <li>Increase character limit from 1,500 characters to 3,000 characters.</li> </ul>	As a response to issuer feedback, the character limit was increased in Element #30.
24.	26	Element #32 ( <i>Mitigation Activities</i> )	Increase character limit	<ul style="list-style-type: none"> <li>Increase character limit from 750 characters to 1,500 characters.</li> </ul>	As a response to issuer feedback, the character limits were increased in Element #32.
25.	26	Criterion #32b	Revise language	<ul style="list-style-type: none"> <li>Modify language to say, “If “Yes” was selected in #31b, describe the mitigation activities implemented to address each problem in meeting the timeline. Also, describe the result(s) of the mitigation activities. If “No” was selected in #31b, check <input type="checkbox"/> Not Applicable.”</li> </ul>	To improve clarity and readability.
26.	N/A	Criterion #21b, Criterion #27b	Remove Criteria	<ul style="list-style-type: none"> <li>Remove Criterion #21b and Criterion #27b</li> </ul>	As a response to issuer feedback, extra pages regarding Criterion #21b and Criterion #27b were removed because they address the collection of SCIDs.