

SUMMARY OF CHANGES TO THE 2022 EXTERNAL QUALITY REVIEW PROTOCOLS

Changes to Title Page and Table of Contents

Updated release date on cover page

Added Protocol 4, Validation of Network Adequacy

Changes to Introduction

- Added background on the November 2020 revisions to the 2016 final rule, including:
 - Required states to identify MCOs exempt from EQR annually on its website in the same location where EQR technical reports are posted. State must include the name(s) of the MCO(s) exempt from EQR, including the beginning date of the current exemption period, or that no MCOs are exempt from EQR.
 - Clarified standards for the EQR compliance review activity in 42 CFR 438.358(b)(1)(iii) by referencing the full set of subpart B, C, and D standards that comprise the compliance review. The rule made further modifications to the standards subject to EQR in each of these subparts, and CMS encourages states and EQROs to familiarize themselves with these changes.
 - Inserted several technical revisions to CHIP regulations that cross-reference Medicaid EQR standards to align CHIP and Medicaid EQR standards, and those quality standards relevant to EQR reporting requirements.
- Updated text and citations based on 2016 Medicaid and CHIP managed care final rule.
- Updated information on managed care quality tools and the EQR process.
- Clarified circumstances for federal financial participation for EQR.
- Noted that several protocols are organized around site visits by the EQRO; indicated that due to changing practices related to the COVID-19 pandemic, site visits may be conducted onsite or virtually to obtain the information specified in the protocols.
- Updated guidance on report content and structure.
- Updated tips for drafting compliant and effective EQR technical reports, tips for state review of EQR technical reports, and tips for posting and submitting EQR technical reports.

Changes to Protocols

Protocol 1. Validation of Performance Improvement Projects

- Clarified that the EQRO should determine the appropriateness of the PIP topic, including how it was selected, input from enrollees or providers, and alignment with CMS-identified priorities and the aims of the National Quality Strategy.
 - Added reference to the National Quality Strategy and CMS priorities and initiatives when developing PIP study topics
 - Added suggestion that states review performance on child and adult Core Set performance measures to identify opportunities to improve performance through a managed care PIP
- Indicated that due to changing practices related to the COVID-19 pandemic, site visits may be conducted onsite or virtually to obtain the information specified in the protocol.

Protocol 2. Validation of Performance Measures

- Indicated that due to changing practices related to the COVID-19 pandemic, site visits may be conducted onsite or virtually to obtain the information specified in the protocol.

Protocol 3. Review and Compliance with Medicaid and CHIP Managed Care Regulations

- Added three activities to the Compliance Review from the 2020 Final Rule:
 - Disenrollment Requirements and Limitations 438.56
 - Enrollee Rights Requirements 438.100
 - Emergency and Post-Stabilization Services 438.114
- Indicated that due to changing practices related to the COVID-19 pandemic, site visits may be conducted onsite or virtually to obtain the information specified in the protocol.

Protocol 4. Validation of Network Adequacy

- Inserted new protocol for validation of network adequacy.

Protocol 5. Validation of Encounter Data Reported by the Medicaid and CHIP Managed Care Plan

- Clarified that before initiating Activity 1, EQROs should request all available encounter data guidance from states, including encounter reporting requirements and standards, data dictionary, edit checks, and other documents.

Protocol 6. Administration or Validation of Quality of Care Surveys

- Updated Table 6.1, Examples of Validated Survey Instruments, including CAHPS Behavioral Health Care Surveys and Long-terms Services and Supports Surveys

- For Activity I.4. Develop the Sampling Plan, clarified the target number of completed surveys and recommended initial sample sizes for the CAHPS® Medicaid Health Plan Survey.

Protocol 8. Implementation of Additional Performance Improvement Projects

- Indicated that PIPs can be conducted in conjunction with CMS and state quality improvement priorities or to align with national quality improvement initiatives.
- Clarified that these activities are eligible for enhanced Federal financial participation at a 75 percent rate under certain circumstances.

Appendices

Appendix A. Information Systems Capabilities Assessment (ISCA)

- Indicated that in the event that onsite activities are not feasible due to the COVID-19 pandemic, site visits may be conducted virtually.

Appendix D. Glossary

- Added terms from Protocol 4, Validation of Network Adequacy.