

## Supporting Statement – Part A

### Submission of Information for the Hospital Inpatient Quality Reporting (IQR) Program: FY 2026 IPPS/LTCH PPS Proposed Rule (OMB# 0938-1022, CMS-10210)

#### A. Background

This is a revision of the currently approved information collection request. The Centers for Medicare & Medicaid Services' (CMS') quality reporting programs promote higher quality, more efficient healthcare for Medicare beneficiaries by collecting and reporting on quality-of-care metrics. This information is made available to consumers, both to empower Medicare beneficiaries and inform decision-making, as well as to incentivize healthcare facilities to make continued improvements.

Specifically, CMS has implemented quality measure reporting programs for multiple settings, including for the inpatient hospital setting, to achieve its overarching priorities and initiatives, including the Meaningful Measure 2.0 Initiative. In particular, Meaningful Measures 2.0 promotes innovation and modernization of all aspects of quality to better address health care priorities reduce burden, and increase efficiency: (1) using only high-value quality measures impacting key quality domains, (2) aligning measures across value-based programs and across partners, including CMS, federal, and private entities, (3) prioritizing outcome and patient-reported measures, and (4) transforming measures to be fully digital and incorporating all-payer data.

The information collection requirements through the FY 2030 payment determination are currently approved under OMB control number 0938-1022 (expiration date January 31, 2026). This request covers data collection requirements for the FY 2027 payment determination and subsequent years. This updated information collection request includes changes in burden associated with removal of the Hospital Commitment to Health Equity, Screening for Social Drivers of Health, and Screen Positive Rate for Social Drivers of Health measures in addition to updated data and wage rates impacting previously approved burden calculations.

#### B. Justification

##### 1. Need and Legal Basis

The Hospital IQR Program was first established to implement Section 501(b) of the Medicare Prescription Drug, Improvement and Modernization Act of 2003 (MMA) (Pub. L. 108-173), which authorized CMS to pay hospitals that successfully reported quality measures a higher annual update to their payment rates. Section 5001(a) of the Deficit Reduction Act of 2005 (DRA) (Pub. L. 109-171) revised the mechanism used to update the standardized amount for payment for hospital inpatient operating costs. This is reflected in sections 1886(b)(3)(B)(viii)(I) and (II) of the Social Security Act, which provide that the Annual Payment Update (APU) under the Inpatient Prospective Payment System will be reduced for any subsection (d) hospital that does not submit certain quality data in a form and manner, and at a time, specified by the Secretary.

Section 1886(o) of the Social Security Act mandates CMS' transition from a passive supplier of health care to an active purchaser of quality care. Pursuant to section 1886(o)(2)(A) of the Social Security Act, CMS must select measures for the Hospital VBP Program from the measures (other than measures of readmissions) specified under the Hospital IQR Program. Consistent with this legislation, CMS established a Hospital VBP Program, beginning effective with payment adjustments on FY 2013 discharges, which qualifies hospitals for financial incentives based on their performance on a defined set of quality measures selected for the Hospital VBP Program from the measures specified under the Hospital IQR Program.

### **(a) Hospital IQR Program Quality Measures**

The FY 2028 APU determination will be based on Hospital IQR Program data reported and supporting forms submitted by hospitals on chart-abstracted measures, patient surveys, and eQMs for calendar year (CY) 2026 discharges, as well as data validation for selected hospitals. In an effort to reduce burden, a variety of different data collection mechanisms are employed, with every consideration taken to employ data and data collection systems already in place.

The Hospital IQR Program seeks to collect and publicly report data on quality-of-care metrics for the hospital inpatient setting. Measure data are submitted via one of several modes: (1) chart-abstracted; (2) claims-based; (3) digital; and (4) survey-based and Patient-Reported Outcomes-Based Performance Measures (PRO-PM), as seen in Table 1.

For measure data submitted as "chart-abstracted," information is derived through analysis of a patient's medical record. Chart-abstracted data involves manual data entry effort and requires some burden from hospitals.

For measure data submitted as "claims-based," information is derived through analysis of administrative Medicare Fee-for-Service (FFS) claims, Medicare Advantage encounter data, and beneficiary enrollment data and therefore do not require additional effort or burden from hospitals.

Measures submitted digitally include electronic clinical quality measures (eQMs), web-based measures, structural measures, process measures, and hybrid measures. For eQMs, information is electronically extracted from electronic health records (EHRs) and/or health information technology (HIT) systems. For web-based measures, measure data are submitted differently depending on the measure. Four measures are calculated using data submitted to the Centers for Disease Control and Prevention's (CDC) National Healthcare Safety Network (NHSN): the COVID-19 Vaccination Coverage Among Healthcare Personnel (HCP) measure under OMB control number 0920-1317 (expiration date January 31, 2028); and the Influenza Vaccination Coverage Among HCP measure, Catheter-Associated Urinary Tract Infection (CAUTI) Standardized Infection Ratio Stratified for Oncology Locations, and Central Line-Associated Bloodstream Infection (CLABSI) Standardized Infection Ratio Stratified for Oncology Locations under OMB control number 0920-0666 (expiration date June 30, 2025). For structural and process measures reported directly to CMS, hospitals are required to submit measure data via CMS' Hospital Quality Reporting (HQR) system. Hybrid measures use both claims-based data

and EHR data. The EHR data consists of a set of core clinical data elements consisting of vital signs and laboratory test information and patient linking variables collected from hospitals' EHR systems.

Lastly, the Hospital IQR Program includes survey and PRO-PM measures. Survey measures utilize information derived through analysis of responses to the Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS) Survey and requires hospitals to administer the survey and submit the survey data to CMS under OMB control number 0938-0981 (expiration date November 30, 2027). The Hospital-Level Total Hip Arthroplasty (THA) and/or Total Knee Arthroplasty (TKA) PRO-PM uses four sources of data for the calculation of the measure: (1) PRO data; (2) claims data; (3) Medicare enrollment and beneficiary data; and (4) U.S. Census Bureau survey data. Hospitals collect the PRO data and submit it electronically via the CMS HQR system; claims data, Medicare enrollment and beneficiary data, and U.S. Census Bureau survey data are already collected via other mechanisms.

**Table 1. Currently Approved Hospital IQR Program Measures for the FY 2027 Payment Determination and Subsequent Years**

<b>Measure Data Submission Mode and Name</b>
<b>Chart-Abstracted Measures</b>
Severe Sepsis and Septic Shock Management Bundle Measure
<b>Hybrid Measures</b>
Hybrid Hospital-Wide All-Cause Readmission Measure
Hybrid Hospital-Wide All-Cause Risk Standardized Mortality Measure
<b>eCQMs</b>
Safe Use of Opioids - Concurrent Prescribing
Cesarean Birth
Severe Obstetric Complications
Discharged on Antithrombotic Therapy
Anticoagulation Therapy for Atrial Fibrillation/Flutter
Antithrombotic Therapy by the End of Hospital Day Two
Venous Thromboembolism Prophylaxis
Intensive Care Unit Venous Thromboembolism Prophylaxis
Hospital Harm - Severe Hypoglycemia
Hospital Harm - Severe Hyperglycemia
Hospital Harm - Opioid Related Adverse Events
Hospital Harm – Pressure Injury
Hospital Harm – Acute Kidney Injury
Hospital Harm – Falls With Injury*
Hospital Harm - Postoperative Respiratory Failure*
Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography (CT) in Adults
Global Malnutrition Composite Score
<b>NHSN Measures</b>
Catheter-Associated Urinary Tract Infection (CAUTI) Standardized Infection Ratio

Stratified for Oncology Locations*.*.*
Central Line-Associated Bloodstream Infection (CLABSI) Standardized Infection Ratio Stratified for Oncology Locations*.*.*
Influenza Vaccination Coverage Among HCP**
COVID-19 Vaccination Coverage Among HCP ****†
<b>Claims-Based Measures</b>
Hospital-Level Risk-Standardized Complication Rate Following Elective Primary THA/TKA (COMP-HIP-KNEE)
Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate Following Acute Ischemic Stroke (MORT-30-STK)
Excess Days in Acute Care after Hospitalization for Acute Myocardial Infarction
Excess Days in Acute Care after Hospitalization for Heart Failure
Excess Days in Acute Care after Hospitalization for Pneumonia
Medicare Spending Per Beneficiary (MSPB)
Thirty-day Risk-Standardized Death Rate among Surgical Inpatients with Complications (Failure-to-Rescue)
<b>Survey-Based Measures</b>
HCAHPS Survey*****
<b>Patient-Reported Outcomes-Based Performance Measures</b>
Hospital-Level Total Hip Arthroplasty and/or Total Knee Arthroplasty Patient-Reported Outcome-Based Performance Measure
<b>Structural Measures</b>
Hospital Commitment to Health Equity†
Maternal Morbidity
Age Friendly Hospital
Patient Safety**
<b>Process Measures</b>
Screening for Social Drivers of Health†
Screen Positive Rate for Social Drivers of Health†

\*These measures will first be reported for the FY 2028 payment determination.

\*\*Burden for these measures is accounted for under OMB control number 0920-0666.

\*\*\*Burden for this measure is accounted for under OMB control number 0920-1317.

\*\*\*\*Burden for this measure is accounted for under OMB control number 0938-0981.

†These measures are proposed for removal in the FY 2026 IPSS/LTCH PPS proposed rule.

### (b) Summary of Proposed Hospital IQR Program Changes

In the FY 2026 IPSS/LTCH PPS proposed rule, we proposed three policies which will affect information collection burden under this OMB control number. We proposed to remove three measures beginning with the CY 2024 reporting period/FY 2026 payment determination: (1) the Hospital Commitment to Health Equity measure; (2) the Screening for Social Drivers of Health measure; and (3) the Screen Positive Rate for Social Drivers of Health measure.

We also proposed several policies in the FY 2026 IPSS/LTCH PPS proposed rule which will not affect information collection burden under OMB control number 0938-1022. We proposed to remove the COVID-19 Vaccination Coverage among HCP measure beginning with the CY 2024 reporting period/FY 2026 payment determination, a burden reduction covered under OMB

control number 0920-0666. We proposed modifications for (1) the Hospital-Level, Risk-Standardized Complication Rate (RSCR) Following Elective Primary Total Hip Arthroplasty (THA) and/or Total Knee Arthroplasty (TKA) measure (herein after referred to as the COMP-HIP-KNEE measure) beginning with the FY 2027 payment determination, associated with the April 1, 2023 - March 31, 2025 performance period; (2) the Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Acute Ischemic Stroke Hospitalization (hereinafter referred to as the MORT-30-STK) measure, beginning with the FY 2027 payment determination, associated with a July 1, 2023 - June 30, 2025 performance period. The modifications for these two measures include adding Medicare Advantage patients to the current cohort of patients, shortening the performance period from three to two years, and making changes to the risk adjustment methodology; none of which affects collection of information burden under OMB control number 0938-1022. In addition, we proposed to modify the reporting requirements of the Hybrid Hospital-Wide Readmission (HWR) measure beginning with the FY 2028 payment determination, associated with a July 1, 2025 - June 30, 2026, performance period; and the Hybrid Hospital-Wide Mortality (HWM) measure beginning with the FY 2028 payment determination, associated with a July 1, 2025 - June 30, 2026, performance period. These modifications would lower the submission thresholds for both measures to allow for up to two missing laboratory results and up to two missing vital signs, reduce the core clinical data elements (CCDEs) submission requirement to 70 percent or more of discharges, and reduce the submission requirement of linking variables to 70 percent or more of discharges. Because the currently approved burden estimates for these measures already account for data submission by all hospitals, these modifications would not affect our burden estimates. Lastly, we are proposing to update the Extraordinary Circumstances Exception (ECE) policy and codify the process for requesting or granting an ECE. This proposed update would explicitly include *extensions* as a type of extraordinary circumstances relief option, in addition to exceptions. Because the process for requesting or granting an ECE would remain the same as the current ECE process, these updates would not affect burden associated with the submission of the ECE form.

### **(c) Hospital IQR Program Administrative Forms**

CMS has implemented procedural requirements that align the current quality reporting programs, including the Hospital IQR Program, the PPS-Exempt Cancer Hospital Quality Reporting (PCHQR) Program, Hospital Readmissions Reduction, Hospital Outpatient Quality Reporting (OQR), Hospital-Acquired Condition (HAC) Reporting, and Hospital Value-Based Purchasing (VBP) Programs. These procedural requirements involve submission of forms to comply with hospital quality program requirements. As a result, many of the forms are used for multiple programs and are included under OMB control number 0938-1022 to reduce administrative burden and the potential for errors when updates are necessary.

The Hospital IQR Program and other current quality reporting programs use ten administrative forms: (1) Notice of Participation Form; (2) Data Accuracy and Completeness Acknowledgement (DACA) Form; (3) Request Form for Withholding/Footnoting Data from Public Reporting; (4) Quality Reporting Program APU Reconsideration Request Form; (5) Quality Reporting Validation Educational Review Form; (6) Validation Review for Reconsideration Request Form; (7) Extraordinary Circumstances Exception (ECE) Request; (8)

Hospital VBP Program Review and Corrections Request Form; (9) Hospital VBP Appeal Request Form; and (10) Hospital VBP Independent CMS Review Request Form. We discuss measure data collection forms in section B.12.o. These forms are used across ten quality programs (Hospital IQR Program, Hospital OQR Program, Inpatient Psychiatric Facility Quality Reporting Program, PCHQR Program, Ambulatory Surgical Center Quality Reporting Program, Hospital VBP Program, HAC Reduction Program, Hospital Readmissions Reduction Program, End Stage Renal Disease Quality Incentive Program, and the Rural Emergency Hospital Quality Program). None of these administrative forms are completed on an annual basis; all are on a need-to-use, exception basis and most hospitals will not need to complete any of these forms in any given year, with the exception of the DACA Form, which is completed annually. The burden for providers associated with forms is discussed in section B.12.k.

a. Notice of Participation Form

To begin participation in the Hospital IQR Program, subsection (d) hospitals (as defined under section 1886(d)(1)(B) of the Social Security Act) paid under the Inpatient Prospective Payment System (IPPS) must complete a Hospital IQR Notice of Participation. The Notice of Participation explains the participation and reporting requirements for the program. The form explains that in order to receive the full market basket update or APU, the hospitals agree to submit data on selected measures and allowing CMS to publish their data for public viewing according to section 1886(b)(3)(B)(viii) of the Social Security Act. We note that the Notice of Participation as well as other forms discussed here and listed in section B.12.o have been previously approved under OMB control number 0938-1022. Other hospitals not paid under the IPPS, such as critical access hospitals (CAHs), may also wish to voluntarily submit data and have their data published for public viewing. In order to accommodate these hospitals, a separate section of the participation form, referred to as the Optional Public Reporting Notice of Participation, is available for these hospitals to give CMS permission to collect and publish data that are voluntarily submitted by a hospital. These hospitals may choose to suppress a measure or measures prior to their posting on the Compare tool hosted by HHS, currently available at: <https://www.medicare.gov/care-compare>, or its successor website(s).

Hospitals that indicated their intent to participate will be considered active Hospital IQR Program participants until they submit a withdrawal to CMS. Hospitals that no longer wish to participate in the Hospital IQR Program or those that no longer wish to submit data for publishing on the Compare tool can notify CMS of their decision using the same form discussed above.

b. DACA Form

Annually, hospitals participating in quality reporting submit the Hospital Quality Reporting DACA form after the end of each reporting year. This requirement was added based on a U.S. Government Accountability Office report from 2006 that recommended that CMS require hospitals to “formally attest to the completeness of the quality data that they submit.” This form, completed annually, is an acknowledgment that the data a hospital has submitted are complete and accurate.

c. Request Form for Withholding/Footnoting Data from Public Reporting

Hospitals that voluntarily participate in quality reporting but are not paid under the IPPS may elect to have those data withheld from public reporting by completing the Request Form for Withholding/Footnoting Data from Public Reporting. Once the form is submitted, data can be withheld for the quarter in which the form is submitted. However, the data will be released on the Compare tool for subsequent releases unless the hospital submits a new Request Form for Withholding/Footnoting Data from Public Reporting indicating the measure(s) the hospital would like to withhold from public reporting for the period.

d. APU Reconsideration Request Form

When CMS determines that a hospital did not meet one or more of the Hospital IQR Program requirement(s), the hospital may submit a request for reconsideration to CMS using the CMS Quality Reporting Program APU Reconsideration Request Form, by the deadline identified on the Hospital IQR Program APU Notification Letter it received. For reconsideration requests related specifically to the validation requirements, hospitals must use the CMS Hospital IQR Program Validation Review for Reconsideration Request Form.

e. Validation Educational Review Form

CMS selects up to 400 subsection (d) hospitals participating in the Hospital IQR Program on an annual basis for data validation (85 FR 58946 and 58948). Specifically, CMS randomly selects up to 200 hospitals for validation and up to 200 hospitals selected using the targeting criteria, applied across eQMs and chart-abstracted measures.

Hospitals may use the educational review process to correct disputed chart-abstracted measure or eQm validation results. To submit a formal request, hospitals can utilize the CMS Quality Reporting Validation Educational Review Form. We note that should the results of an educational review not be favorable to a hospital, a hospital may still also request reconsideration of those results using the CMS Hospital IQR Program Validation Review for Reconsideration Request Form.

f. Validation Review for Reconsideration Request Form

If CMS determines that a hospital did not meet any of the Hospital IQR Program requirements due to a confidence interval validation score of less than 75 percent and the hospital would like to request a reconsideration, the hospital must complete and submit this form.

g. ECE Request Form

CMS offers a process for hospitals to request exceptions to the reporting of required quality data, including eQm data, for one or more quarters when a hospital experiences an extraordinary circumstance beyond the hospital's control. The CMS Quality Program ECE Request Form indicates that for non-eQm circumstances, the request must be submitted within 30 calendar days of an extraordinary circumstance event for all programs, a proposed change from the

current 90 day timing used on the current form. In addition, the form indicates that for eCQM reporting circumstances under the Hospital IQR Program and Hospital OQR Program, the request must be submitted by April 1<sup>st</sup> (for Hospital IQR) or June 15 (Hospital OQR) following the end of a reporting period calendar year. In the FY 2026 IPPS/LTCH PPS proposed rule, we are proposing (1) that CMS may grant an ECE with respect to reporting requirements in the event of an extraordinary circumstance; and (2) that a hospital may request an ECE within 30 calendar days of the date that the extraordinary circumstance occurred; none of which affects collection of information burden under OMB control number 0938-1022.

As noted at page 90 FR 18344 of the FY 2026 IPPS/LTCH PPS proposed rule, we are proposing to update the ECE policy and codify the process for requesting or granting an ECE. This proposed update would explicitly include *extensions* as a type of extraordinary circumstances relief option, in addition to exceptions. Because the process for requesting or granting an ECE would remain the same as the current ECE process, these updates would not affect burden associated with the submission of the ECE form.

h. Hospital VBP Program Review and Corrections Request Form

We may only select measures for the Hospital VBP Program from the measures (other than measures of readmissions) specified under the Hospital IQR Program. Hospitals may appeal the calculation of their performance assessment with respect to the performance standards, as well as their Total Performance Score (TPS), for the Hospital VBP Program. Hospitals may review and request recalculation of their hospital's performance scores on each condition, domain, and TPS using the Hospital VBP Program Review and Corrections Request Form within 30 calendar days of the posting date of the Value-Based Percentage Payment Summary Report.

i. Hospital VBP Appeal Request Form

CMS has implemented an additional appeal process available to eligible hospitals participating in the Hospital VBP Program, beyond the existing Review and Corrections process. Hospitals must submit an Appeal Request within 30 calendar days from the date CMS informed the hospital through Hospital Quality Reporting of its decision on the Review and Corrections Request.

j. Hospital VBP Independent CMS Review Request Form

CMS has implemented an independent review that is an additional appeal process available to eligible hospitals participating in the Hospital VBP Program, beyond the existing Review and Corrections process and Appeal process. Hospitals dissatisfied with the outcome of an Appeal may request an Independent CMS Review. Hospitals are strongly encouraged to request the Independent CMS Review within 30 days after they receive a decision on their Appeal. Hospitals can anticipate a review decision within 90 calendar days following receipt of the Independent CMS Review Request.

## 2. Information Users

The Hospital IQR Program, as a pay-for-reporting program, strives to have a streamlined measure set that provides meaningful measurement that also serves to differentiate facilities by quality of care while limiting burden to the fullest extent possible. CMS provides confidential feedback reports that hospitals may use to assess their performance and operationalize quality improvement activities throughout the quality reporting period. These reports include the data that CMS has collected from the hospital and the hospital's claims, and some also include information about how the hospital's data compare relative to the performance of other hospitals. For example, the Facility, State and National (FSN) Report allows hospitals to compare their performance related to a specific measure during a specific timeframe, to the average performance of other hospitals at the state and national levels.

CMS will use the information collected from hospital quality reporting to set payment adjustments for value-based purchasing. For example, the Hospital VBP Program Baseline Measures Report allows hospitals to compare their performance for each measure to the program's benchmarks and achievement thresholds, which are obtained from the scores of all hospitals. These reports allow hospitals time to assess how their current performance in each measure could be scored in the upcoming Hospital VBP payment determinations while there is still time to target improvement activities related to specific measures so that their performance and scores can be maximized.

Hospital measure information is also used by CMS to direct its contractors to focus on particular areas of improvement and to develop quality improvement initiatives. Medicare beneficiaries experience a high rate of preventable readmissions, which are burdensome to patients and families, as well as costly. Quality Improvement Organizations (QIOs), under contract with CMS, use readmissions data from CMS to assist communities to improve patient safety, care coordination, disease prevention, and chronic disease management. For example, the QIN-QIO program helps communities with high readmission rates form local coalitions, identify the factors driving avoidable hospital readmissions in their area, and find ways to better coordinate care and to encourage patients to manage their health more actively.

This information is also available to Medicare beneficiaries, as well as to the general public, by providing hospital information on the Compare tool and in the Provider Data Catalog (PDC) available at [data.cms.gov](http://data.cms.gov), or its successor website(s), to assist them in making decisions about their healthcare. CMS sometimes conducts focus groups or market testing prior to publicly reporting hospital quality data on the Compare tool to get feedback on ways to make the website more user-friendly. Feedback from these focus groups has helped CMS understand how beneficiaries and consumers use the Compare tool. Under emergency circumstances, consumers choose hospitals based on proximity, reputation, prior experience, or their doctor's recommendation. For childbirth or elective hospital admissions, when patients and their family members may have the time and motivation to consider options and engage in informed decision making, they have expressed interest in information such as the provider's track record in treating their condition, safety and infection rates, and a hospital's recognized areas of expertise, as well as to take into consideration their doctor's recommendation.

Under section 1890A(a)(6) of the Social Security Act, CMS is required to evaluate the impact and efficiency of CMS measures in quality reporting programs and to post the report every three years. Following the compilation of data from the Hospital IQR Program and other CMS programs, CMS' findings were formally written into the latest triennial National Impact Assessment Report, which was released in CY 2024.<sup>1</sup>

### **3. Use of Information Technology**

To assist hospitals in participating in standardized data collection initiatives across the industry, CMS continues to improve data collection tools with the goal of making data submission easier (for example, the automated collection of electronic patient data in EHRs for eQMs and hybrid measures, the free CMS Abstraction and Reporting Tool (CART) for use in collecting data from paper or electronic medical records for chart-abstracted measures, or the collection of data from federal registries like the NHSN), and to increase the utility of the data provided by the hospitals. CMS also provides a secure data warehouse via the HQR system for storage and transmittal of data as well as data validation and aggregation services prior to the release of data to the CMS website. Hospitals have the option of using vendors to transmit the data. CMS has engaged a national support contractor to provide technical assistance with the data collection tool, other program requirements, and to provide education to support program participants.

As reflected by the collection and reporting of claims-based quality measures, quality measures submitted via the HQR system, and measures which are digitally-derived (for example, eQMs), efforts are made to reduce burden by limiting the adoption of measures requiring the submission of patient-level information that must be acquired through chart-abstraction and to employ existing data and data collection systems. The complete list of measures and data collection forms are organized by type of data collected and data collection mechanism in Table 1.

For the claims-based measures or measures which collect data from claims, Medicare Advantage encounter data, and other administrative data in part, this section is not applicable, because these measures can be fully or partially calculated based on data that are already reported to the Medicare program for payment purposes. Therefore, no additional information technology will be required of hospitals to collect these data for these measures.

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<sup>1</sup> The latest 2024 Impact Assessment Report, as well as earlier reports from 2012, 2015, 2018, and 2021 may be found at: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/National-Impact-Assessment-of-the-Centers-for-Medicare-and-Medicaid-Services-CMS-Quality-Measures-Reports>.

#### **4. Duplication of Efforts**

The information to be collected is not duplicative of similar information collected by CMS or other efforts to collect quality of care data for hospital inpatient care. CMS requires hospitals to submit quality measure data for services provided in the inpatient setting. We prioritize efforts to reduce reporting burden for the collection of quality of care information by utilizing electronic data that hospitals already report to The Joint Commission for accreditation, as well as aligning eCQMs and related reporting requirements with the Medicare Promoting Interoperability Program for Eligible Hospitals and CAHs.

#### **5. Small Business**

Information collection requirements are designed to allow maximum flexibility specifically to small hospitals wishing to participate in hospital reporting. This effort will assist small hospitals in gathering information for their own quality improvement efforts. We define a “small hospital” as one with 1-99 inpatient beds. The Hospital IQR Program included approximately 886 participating IPPS small hospitals for the FY 2026 payment determination and 15 small hospitals located in Maryland or Puerto Rico. In addition, as defined under 42 CFR Part 485 subpart F, a CAH (referred to as a non-IPPS hospital under the Hospital IQR Program) may have no more than 25 inpatient beds. We estimate approximately 1,400 CAHs could voluntarily participate in the Hospital IQR Program; therefore, we assume all 1,400 CAHs hospitals would qualify as small hospitals. As a result, we estimate a total of 2,301 small hospitals (886 IPPS + 15 Maryland/Puerto Rico + 1,400 CAHs) will submit data for the Hospital IQR Program for the CY 2026 reporting period.

The Health Resources & Services Administration’s Medicare Rural Hospital Flexibility Program (Flex) and Medicare Beneficiary Quality Improvement Project, as well as CMS’ Quality Improvement Organizations, provide technical assistance to small and rural hospitals to reduce burden and improve healthcare quality. We also provide a help-desk hotline for troubleshooting purposes and 24/7 free information available on the QualityNet website through a Questions and Answers function.

## 6. Less Frequent Collection

CMS has designed the collection of quality-of-care data to be the minimum necessary for data validation and calculation of summary figures to be reliable estimates of hospital performance. Frequency of data collection may vary (monthly, quarterly, annually, etc.) based on how a quality measure is specified. The following table details the frequency of data submission to CMS by measure type.

**Table 2. Frequency of Data Submission by Measure Type**

<b>Measure Type</b>	<b>Frequency of Data Submission</b>
Chart-abstracted	Quarterly
Structural and process measures	Annually
Survey measures	Quarterly
NHSN (other than CAUTI and CLABSI Standardized Infection Ratio Stratified for Oncology Locations measures) and EHR-based (for example, eCQMs, hybrid measures)	Annually
CAUTI and CLABSI Standardized Infection Ratio Stratified for Oncology Locations measures	Quarterly
Patient Reported Outcome-Performance Measures	Semi-annually

Claims-based measures are calculated from Medicare FFS claims data and Medicare Advantage encounter data; hospitals submit claims for reimbursement or payment per claims processing timeliness requirements. In addition, the NHSN web-based measure collected by the CDC is submitted for at least one self-selected week during each month of the reporting quarter. To collect these measure data less frequently would compromise the timeliness of any calculated estimates.

## 7. Special Circumstances

There are no special circumstances.

## 8. Federal Register Notice/Outside Consultation

A 60-day *Federal Register* notice of the FY 2026 IPPS/LTCH PPS proposed rule (RIN 0938-AV45, CMS-1833-P) was published on April 30, 2025 (90 FR 18002).

Measures adopted for the Hospital IQR Program are required by statute to undergo a recognized consensus process. Section 1890(b) of the Social Security Act requires CMS to consider input on the selection of quality and efficiency measures from a multistakeholder group convened by the “consensus-based entity.” To fulfill this requirement, the Partnership for Quality Measurement (PQM) provides input on the Measures under Consideration (MUC) list as part of

the Pre-Rulemaking Measure Review (PRMR). We refer readers to <https://p4qm.org/PRMR-MSR> for more information on the PRMR process.

CMS is additionally supported in this program's efforts by The Joint Commission, CDC, Health Resources and Services Administration, and the Agency for Healthcare Research and Quality. These organizations consult with CMS on an ongoing basis, providing technical assistance in developing and/or identifying quality measures, and assisting in making collected information accessible, understandable, and relevant to the public. CMS also regularly engages interested parties (for example solicitation of comments).

## **9. Payment/Gift to Respondent**

Hospitals are required to submit these data in order to receive the full APU. No other payments or gifts will be given to hospitals for participation.

## **10. Confidentiality**

We pledge privacy to the extent provided by law. As a matter of policy, CMS will prevent the disclosure of personally identifiable information contained in the data submitted. All information collected under the Hospital IQR Program will be maintained in strict accordance with statutes and regulations governing confidentiality requirements for CMS data, including the Privacy Act of 1974 (5 U.S.C. 552a), the Health Insurance Portability and Accountability Act (HIPAA), and the Quality Improvement Organizations confidentiality requirements, which can be found at 42 C.F.R. Part 480. In addition, the tools used for transmission of data are considered confidential forms of communication, and there are safeguards in place in accordance with HIPAA Privacy and Security Rules to protect the submission of patient information, at 45 CFR Part 160 and 164, Subparts A, C and E. Only hospital-specific data will be made publicly available as mandated by statute.

Data related to the Hospital IQR Program is housed in the HQR application group. CMS' HQR is a General Support System (GSS) housing protected health information (PHI). Users who access CMS' HQR system are identity-managed to permit access to the system and have role-based restrictions (including log-in and password) to the data they can see. The System of Records Notice (SORN) in use for the quality programs including the Hospital IQR Program is MBD 09-70-0536, as modified on February 14, 2018 (83 FR 6591).

## **11. Sensitive Questions**

There are no questions of a sensitive nature associated with these forms. Case-specific clinical data elements will be collected and are necessary to calculate statistical measures. These statistical measures are the basis of all subsequent improvement initiatives derived from this collection and cannot be calculated without case-specific data. Case-specific data will not be released to the public and are not releasable by requests under the Freedom of Information Act. Only hospital-specific data will be released to the public after hospitals have had an opportunity to review the data that are to be made public with respect to the hospital, as mandated by statute. The patient-specific data remaining in the CMS clinical data warehouse

after the data are aggregated for release for public reporting will continue to be subject to the strict confidentiality regulations in 42 CFR Part 480.

## 12. Burden Estimate (Total Hours & Wages)

### (a) Background

In the FY 2026 IPPS/LTCH PPS proposed rule, we proposed the removal of three measures which affect information collection burden under OMB control number 0938-1022, and another measure not impacting burden under this OMB control number. We proposed to remove three measures beginning with the CY 2024 reporting period/FY 2026 payment determination: (1) the Hospital Commitment to Health Equity measure; (2) the Screening for Social Drivers of Health measure; and (3) the Screen Positive Rate for Social Drivers of Health Measure.

We discuss other policies proposed in the FY 2026 IPPS/LTCH PPS proposed rule which will not affect information collection burden under OMB control number 0938-1022 in section B.1.a.

### (b) Burden for the FY 2027 Payment Determination

Our currently approved burden estimates are based on an assumption of approximately 3,050 IPPS hospitals and 1,500 non-IPPS hospitals. Based on data from the FY 2025 Hospital IQR Program payment determination, we are maintaining that assumption. For the purposes of burden estimation, we assume all activities associated with the Hospital IQR Program will be completed by Medical Records Specialists, with the exception of survey completion which will be completed by patients. These staff are qualified to complete the tasks associated with the chart-abstraction of patient data from medical records, the submission of electronic data from EHRs, the submission of data to clinical registries, and the completion of any of the other applicable forms associated with activities related to the Hospital IQR Program.

OMB has currently approved 2,283,878 hours at a cost of approximately \$92.1 million under OMB control number 0938-1022, accounting for information collection burden experienced by approximately 3,050 IPPS hospitals and 1,500 non-IPPS hospitals for the FY 2027 payment determination. As shown in Table 3, using updated wage rates, we estimate a revised baseline burden of 2,283,877 hours at a cost of \$98.0 million for the FY 2027 payment determination. As previously stated, our burden estimates exclude burden associated with the NHSN under OMB control number 0920-0666 (expiration date June 30, 2025), the COVID-19 Vaccination Coverage among Healthcare Personnel (HCP) measure under OMB control number 0920-1317 (expiration date January 31, 2028), the HCAHPS Survey measure under OMB control number 0938-0981 (expiration date November 30, 2027), and the Health Insurance Common Claims Form and Supporting Regulations under OMB control number 0938-1197 (expiration date October 31, 2027).

**Table 3. Currently Approved Burden Estimates for the Hospital IQR Program Measure Set and Other Activities for the FY 2027 Payment Determination**

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<i>Measure Set</i>	<i>Estimated time per record (minutes) - FY 2027 payment determination</i>	<i>Number reporting quarters per year - FY 2027 payment determination</i>	<i>Number of respondents</i>	<i>Average number records per hospital per quarter</i>	<i>Annual burden (hours) per hospital</i>	<i>Total Burden Hours for FY 2027 payment determination</i>
<b>CHART ABSTRACTION</b>						
<b>IPPS Hospitals (3,050)</b>						
Sepsis measure	60	4	3,050	100	400	1,220,000
<b>Non-IPPS Hospitals (1,500)</b>						
Sepsis measure	60	4	362	25	100	36,200
<b>Chart Abstracted Measure Subtotal (IPPS and Non-IPPS)</b>						<b>1,256,200</b>
<b>HYBRID MEASURES</b>						
<b>IPPS Hospitals (3,050)</b>						
Hybrid HWR measure	10	4	3,050	1	0.67	2,033
Hybrid HWM Measure	10	4	3,050	1	0.67	2,033
<b>Non-IPPS Hospitals (1,500)</b>						
Hybrid HWR measure	10	4	1,500	1	0.67	1,000
Hybrid HWM measure	10	4	1,500	1	0.67	1,000
<b>Hybrid Measure Subtotal (IPPS and Non-IPPS)</b>						<b>6,067</b>
<b>STRUCTURAL MEASURES</b>						
<b>IPPS Hospitals (3,050)</b>						
Maternal Morbidity measure	5	1	3,050	1	0.083	254
Hospital Commitment to Health Equity measure	10	1	3,050	1	0.167	509
Age Friendly Hospital measure	10	1	3,050	1	0.167	509
<b>Non-IPPS Hospitals (1,500)</b>						
Maternal Morbidity measure	5	1	1,500	1	0.083	125
Hospital Commitment to Health Equity measure	10	1	1,500	1	0.167	250
Age Friendly Hospital measure	10	1	1,500	1	0.167	250
<b>Structural Measure Subtotal (IPPS and Non-IPPS)</b>						<b>1,897</b>
<b>REPORTING eCQMs</b>						
<b>IPPS Hospitals (3,050)</b>						
Reporting 6 eCQMs	60	4	3,050	1	4.00	12,200

Login and Run Software for Excessive Radiation Dose eCQM	15	1	3,050	1	0.25	763
<b>Non-IPPS Hospitals (1,500)</b>						
Reporting 6 eCQMs	60	4	1,500	1	4.00	6,000
Login and Run Software for Excessive Radiation Dose eCQM	15	1	1,500	1	0.25	375
<b>eCQM Subtotal (IPPS and Non-IPPS)</b>						<b>19,338</b>
<b>PROCESS MEASURES</b>						
<b>IPPS Hospitals (3,050)</b>						
Screening for Social Drivers of Health measure (Survey)	0.033	1	18,765,000	1	205.1	625,500
Screening for Social Drivers of Health measure (Reporting)	10	1	3,050	1	0.167	509
Screen Positive Rate for Social Drivers of Health measure	10	1	3,050	1	0.167	509
<b>Non-IPPS Hospitals (1,500)</b>						
Screening for Social Drivers of Health measure (Survey)	0.033	1	9,230,000	1	205.1	307,667
Screening for Social Drivers of Health measure (Reporting)	10	1	1,500	1	0.167	250
Screen Positive Rate for Social Drivers of Health measure	10	1	1,500	1	0.167	250
<b>Process Measures Subtotal (IPPS and Non-IPPS)</b>						<b>934,685</b>
<b>PRO-PM MEASURES</b>						
<b>IPPS Hospitals (3,050)</b>						
THA/TKA PRO-PM measure (Survey; Voluntary)	7.25	N/A	41,250	N/A	2.22	4,984
THA/TKA PRO-PM measure (Survey; Mandatory)	7.25	N/A	165,000	N/A	4.43	19,938
THA/TKA PRO-PM measure (Reporting; Voluntary)	10	1	1,525	1	0.167	254
THA/TKA PRO-PM measure (Reporting; Mandatory)	10	1	3,050	1	0.167	509
<b>Non-IPPS Hospitals (1,500)</b>						
THA/TKA PRO-PM measure (Survey; Voluntary)	7.25	N/A	*	N/A	2.22	*
THA/TKA PRO-PM measure (Survey; Mandatory)	7.25	N/A	*	N/A	4.43	*

Mandatory)						
THA/TKA PRO-PM measure (Reporting; Voluntary)	10	1	750	1	0.167	125
THA/TKA PRO-PM measure (Reporting; Mandatory)	10	1	1,500	1	0.167	250
<b>PRO-PM Measures Subtotal</b>						<b>26,060</b>
<b>OTHER ACTIVITIES</b>						
<b>All Hospitals (3,050 IPPS + 1,500 Non-IPPS)</b>						
Population and sampling for the ongoing measure sets	15	4	4,550	4	4	18,200
Review reports for claims-based measure sets	60	4	4,550	1	4	18,200
eCQM Validation	10	4	400	8	5.33	2,133
All other forms used in the data collection process	14.5	1	4,550	1	0.25	1,098
<b>Subtotal other activities</b>						<b>39,631</b>
<b>Total Burden Hours</b>						<b><u>2,283,877</u></b>
<b>Total Burden for Surveys @ Average Individual Labor rate (958,089 hours x \$25.63/hr)</b>						<b><u>\$24,555,821</u></b>
<b>Total Burden @ Medical Records Specialist labor rate (1,325,788 hours x \$55.38/hr)</b>						<b><u>\$73,422,127</u></b>
<b>Total Burden</b>						<b><u>\$97,977,948</u></b>

I \* We are not able to accurately distinguish the number of Hospital-Level THA/TKA procedures that take place in IPPS hospitals from those conducted in non-IPPS hospitals. As a result, we combine the IPPS and non-IPPS hospital burden associated with completion of the pre-operative and post-operative surveys.

Changes to currently approved burden estimates due to policies in the FY 2026 IPPS/LTCH PPS proposed rule are discussed below.

### (c) Updated Hourly Wage Rates

Using the most recent data from the BLS for medical records specialists (SOC 29-2072), entitled, the May 2023 National Occupational Employment and Wage Estimates (OEWS), we propose to use the mean hourly wage for medical records specialists for the industry, “general medical and surgical hospitals,” which is \$27.69.<sup>2</sup> We believe the industry of “general medical and surgical hospitals” is more specific to our settings for use in our calculations than other industries that fall under medical records specialists, such as “office of physicians” or “nursing care facilities.” We calculate the cost of overhead, including fringe benefits, at 100 percent of the mean hourly wage, consistent with previous years. This is necessarily a rough adjustment, both because fringe benefits and overhead costs vary significantly by employer and methods of estimating these costs vary widely in the literature. Nonetheless, we believe that doubling the hourly wage rate (\$27.69 × 2 = \$55.38) to estimate total cost is a reasonably accurate estimation method. Accordingly, we

<sup>2</sup> U.S. Bureau of Labor Statistics. Occupational Outlook Handbook, Medical Records Specialists. Accessed March 11, 2025. Available at: <https://www.bls.gov/oes/current/oes292072.htm>.

calculate cost burden to hospitals using a wage plus benefits estimate of \$55.38 per hour for the Hospital IQR Program.

We calculate the cost for beneficiaries undertaking administrative and other tasks on their own time to be a post-tax wage of \$25.63/hr. The Valuing Time in U.S. Department of Health and Human Services Regulatory Impact Analyses: Conceptual Framework and Best Practices identifies the approach for valuing time when individuals undertake activities on their own time.<sup>3</sup> To derive the costs for beneficiaries, a measurement of the usual weekly earnings of wage and salary workers of \$1,192, divided by 40 hours to calculate an hourly pre-tax wage rate of \$29.80/hr.<sup>4</sup> This rate is adjusted downwards by an estimate of the effective tax rate for median income households of about 14 percent calculated by comparing pre- and post-tax income,<sup>5</sup> resulting in the post-tax hourly wage rate of \$25.63/hr. Unlike our State and private sector wage adjustments, we are not adjusting beneficiary wages for fringe benefits and other indirect costs since the individuals' activities, if any, would occur outside the scope of their employment.

#### **(d) Chart-Abstracted Measure Reporting and Submission Burden**

We are not proposing any changes to the reporting or submission requirements for the Severe Sepsis and Septic Shock measure in the FY 2026 IPPS/LTCH PPS proposed rule. As shown in Table 3 for the FY 2027 payment determination, we currently estimate the information collection burden associated with the reporting of chart-abstracted measures to be 60 minutes or 1 hour per record for the Severe Sepsis and Septic Shock measure. We continue to assume that each IPPS hospital will report 100 records quarterly for a total annual burden of 400 hours (1 hour/record x 100 records x 4 quarters) per IPPS hospital. We estimate an annual burden of 1,220,000 hours (400 hours/hospital x 3,050 IPPS hospitals) at a cost of \$67,563,600 (1,220,000 hours x \$55.38) across all IPPS hospitals. We also estimate an annual burden of 36,200 hours (100 hours/hospital x 362 non-IPPS hospitals) at a cost of \$2,004,756 (36,200 hours x \$55.38) across all participating non-IPPS hospitals.

#### **(e) eCQM Reporting and Submission Burden**

For eCQMs, only the time associated with electronically submitting data to CMS is accounted for in our burden estimates because patient data are already entered into EHRs and HITs as part of clinical practice. We are not proposing any changes to the reporting or submission requirements for eCQMs in the FY 2026 IPPS/LTCH PPS proposed rule.

For the CY 2026 reporting period/FY 2028 payment determination, hospitals are required to submit data for eight total eCQMs: three self-selected and the Safe Use of Opioids-Concurrent

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<sup>3</sup> <https://aspe.hhs.gov/reports/valuing-time-us-department-health-human-services-regulatory-impact-analyses-conceptual-framework>. Office of the Assistant Secretary for Planning and Evaluation, Valuing Time in U.S. Department of Health and Human Services Regulatory Impact Analyses: Conceptual Framework and Best Practices, September 17, 2017. Available at [https:// aspe.hhs.gov/reports/valuing-time-us-departmenthealth-human-services-regulatory-impact-analysesconceptual-framework](https://aspe.hhs.gov/reports/valuing-time-us-departmenthealth-human-services-regulatory-impact-analysesconceptual-framework).

<sup>4</sup> Bureau of Labor and Statistics, Usual Weekly Earnings of Wage and Salary Workers, First Quarter 2024. Available at <https://www.bls.gov/news.release/pdf/wkyeng.pdf>. Accessed March 3, 2025.

<sup>5</sup> U.S. Census Bureau, Income in the United States: 2023, p. 43, September 2024. Available at <https://www2.census.gov/library/publications/2024/demo/p60-282.pdf>.

Prescribing, Severe Obstetric Complications, Cesarean Birth, Hospital Harm - Severe Hypoglycemia, and Hospital Harm - Severe Hyperglycemia eQMs. For the CY 2027 reporting period/FY 2029 payment determination, hospitals are required to submit data for these eight eQMs in addition to the Hospital Harm - Opioid-Related Adverse Events eQM. Lastly, for the CY 2028 reporting period/FY 2030 payment determination and subsequent years, hospitals are required to submit data for these nine eQMs as well as the Hospital Harm - Pressure Injury and Hospital Harm - Acute Kidney Injury eQMs.

We continue to estimate the information collection burden associated with the eQM reporting and submission requirements to be 10 minutes per measure per quarter of eQM data. For the CY 2026 reporting period/FY 2028 payment determination, we estimate a total of 80 minutes or 1.33 hours (10 minutes  $\times$  8 eQMs) per hospital per quarter of eQM data. We estimate a total burden of across all participating IPPS hospitals of 16,267 hours (1.33 hours  $\times$  3,050 IPPS hospitals  $\times$  4 quarters) at a cost of \$900,866 (16,267 hours  $\times$  \$55.38). We also estimate a total burden of 8,000 hours (1.33 hours  $\times$  1,500 non-IPPS hospitals  $\times$  4 quarters) at a cost of \$443,040 (8,000 hours  $\times$  \$55.38) for reporting four quarters of eQM data for all non-IPPS hospitals.

For the CY 2027 reporting period/FY 2029 payment determination, we estimate a total of 90 minutes or 1.5 hours (10 minutes  $\times$  9 eQMs) per hospital per quarter of eQM data. We estimate a total burden of across all participating IPPS hospitals of 18,300 hours (1.5 hours  $\times$  3,050 IPPS hospitals  $\times$  4 quarters) at a cost of \$1,013,454 (18,300 hours  $\times$  \$55.38). We also estimate a total burden of 9,000 hours (1.5 hours  $\times$  1,500 non-IPPS hospitals  $\times$  4 quarters) at a cost of \$498,420 (9,000 hours  $\times$  \$55.38) for reporting four quarters of eQM data for all non-IPPS hospitals.

For the CY 2028 reporting period/FY 2030 payment determination and subsequent years, we estimate a total of 110 minutes or 1.83 hours (10 minutes  $\times$  11 eQMs) per hospital per quarter of eQM data. We estimate a total burden across all participating IPPS hospitals of 22,326 hours annually (1.83 hours  $\times$  3,050 IPPS hospitals  $\times$  4 quarters) at a cost of \$1,236,414 (22,326 hours  $\times$  \$55.38). We also estimate a total burden of 11,000 hours annually (1.83 hours  $\times$  1,500 non-IPPS hospitals  $\times$  4 quarters) at a cost of \$609,180 (11,000 hours  $\times$  \$55.38) for reporting four quarters of eQM data for all non-IPPS hospitals.

For the Excessive Radiation Dose eQM, hospitals use software to convert images within their EHR into intermediate data elements. Hospitals can use the free Alara Imaging Software for CMS Measure Compliance or similar software. For the Alara Imaging Software, hospitals log in through the measure developer's secure portal and run the software inside their firewall. The software runs automatically to create the three intermediate data elements needed for the measure. Once the software finishes creating these intermediate variables, hospitals can send the data to their EHR for measure calculation and reporting. The software allows additional options such as the ability to send the data to other business associates, such as vendors, if needed. No manual data entry is required. While this eQM is not mandatory but is instead an eQM available for hospitals to self-select, for estimating purposes we assume all hospitals will report this eQM. In future years when we have data on the number of hospitals electing to report this eQM, we may update our estimate at that time. We estimate that each hospital will spend approximately 15 minutes (0.25 hours) annually to conduct these activities prior to data

submission and therefore estimate a total annual burden of 763 hours (0.25 hours x 3,050 hospitals) at a cost of \$42,227 (763 hours x \$55.38) for all IPPS hospitals. We also estimated a total annual burden of 375 hours (0.25 hours x 1,500 hospitals) at a cost of \$20,768 (375 hours x \$55.38) for all non-IPPS hospitals.

Based on the calculations discussed in this section, we estimate a total burden for reporting of eQMs for the CY 2026 reporting period/FY 2028 payment determination of 25,405 hours (16,267 + 8,000 + 763 + 375) at a cost of \$1,406,901 (\$900,866 + \$443,040 + \$42,227 + \$20,768). For the CY 2027 reporting period/FY 2029 payment determination, we estimate a total burden of 28,438 hours (18,300 + 9,000 + 763 + 375) at a cost of \$1,574,869 (\$1,013,454 + \$498,420 + \$42,227 + \$20,768). For the CY 2028 reporting period/FY 2030 payment determination and subsequent years, we estimate a total annual burden of 34,464 hours (22,326 + 11,000 + 763 + 375) at a cost of \$1,908,589 (\$1,236,414 + \$609,180 + \$42,227 + \$20,768).

**Table 4. Estimated Burden for the eCQM Reporting and Submission Requirements for the FY 2028 Payment Determination and Subsequent Years**

<i>eCQM Measure Reporting</i>	<i>Estimated time per record (minutes)</i>	<i>Number reporting quarters per year</i>	<i>Number of hospitals reporting</i>	<i>Average number records per hospital per quarter</i>	<i>Annual burden (hours) per hospital</i>	<i>Total Annual Hours for all hospitals</i>
<b>FY 2028 Payment Determination</b>						
Reporting 8 eQMs (IPPS Hospitals)	80	4	3,050	1	5.33	16,267
Reporting 8 eQMs (Non-IPPS Hospitals)	80	4	1,500	1	5.33	8,000
Login and Run Software for Excessive Radiation Dose eCQM (IPPS Hospitals)	15	1	3,050	1	0.25	763
Login and Run Software for Excessive Radiation Dose eCQM (Non-IPPS Hospitals)	15	1	1,500	1	0.25	375
<b>Total Burden Hours</b>						<b>25,405</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$1,406,901</b>
<b>FY 2029 Payment Determination</b>						
Reporting 9 eQMs (IPPS Hospitals)	90	4	3,050	1	6	18,300
Reporting 9 eQMs (Non-IPPS Hospitals)	90	4	1,500	1	6	9,000
Login and Run Software for	15	1	3,050	1	0.25	763

Excessive Radiation Dose eCQM (IPPS Hospitals)						
Login and Run Software for Excessive Radiation Dose eCQM (Non-IPPS Hospitals)	15	1	1,500	1	0.25	375
<b>Total Burden Hours</b>						<b>28,438</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$1,574,869</b>
<b>FY 2030 Payment Determination and Subsequent Years</b>						
Reporting 11 eCQMs (IPPS Hospitals)	110	4	3,050	1	7.33	22,326
Reporting 11 eCQMs (Non-IPPS Hospitals)	110	4	1,500	1	7.33	11,000
Login and Run Software for Excessive Radiation Dose eCQM (IPPS Hospitals)	15	1	3,050	1	0.25	763
Login and Run Software for Excessive Radiation Dose eCQM (Non-IPPS Hospitals)	15	1	1,500	1	0.25	375
<b>Total Burden Hours</b>						<b>34,464</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$1,908,589</b>

**(f) Structural Measure Reporting and Submission Burden**

In the FY 2026 IPPS/LTCH PPS proposed rule, we proposed to remove the Hospital Commitment to Health Equity measure beginning with the CY 2024 reporting period/FY 2026 payment determination.

We are not proposing any changes to the reporting or submission requirements for the Maternal Morbidity Structural and Age Friendly Hospital measures in the FY 2026 IPPS/LTCH PPS proposed rule. As shown in Table 3 for the FY 2027 payment determination, we currently estimate the information collection burden associated with the reporting of the Maternal Morbidity and Age Friendly Hospital measures to be 5 minutes (0.083 hours) and 10 minutes (0.167 hours) per hospital per year, respectively.

Reporting on the Maternal Morbidity Structural measure involves each hospital responding to a single question using a web-based tool available via CMS’ HQR System with one of the following response options: (A) “Yes”; (B) “No”; or (C) “N/A (our hospital does not provide inpatient labor/delivery care).” Hospitals are required to submit responses for this structural measure on an annual basis during the submission period. We estimate an annual burden of 254 hours across all IPPS hospitals (0.083 hours × 3,050 IPPS hospitals) at a cost of \$14,067 (254 hours × \$55.38) and an annual burden estimate of 125 hours across all non-IPPS hospitals (0.083 hours x 1,500 non-IPPS hospitals) at a cost of \$6,923 (125 hours x \$55.38).

Reporting on the Age Friendly Hospital measure involves each hospital providing responses and attesting “yes” or “no” in response to a total of five domains annually during the submission period for a given reporting period through CMS’ HQR System. We estimate an annual burden of 509 hours across all IPPS hospitals (0.167 hours × 3,050 IPPS hospitals) at a cost of \$28,188 (509 hours × \$55.38) and an annual burden of 250 hours across all non-IPPS hospitals (0.167 hours × 1,500 non-IPPS hospitals) at a cost of \$13,845 (250 hours × \$55.38).

As previously stated, the burden associated with the Patient Safety Structural measure is not included under OMB control number 0938-1022 because the data for this measure will be collected via the NHSN under OMB control number 0920-0666.

**Table 5. Estimated Burden for Structural Measure Reporting for the FY 2028 Payment Determination and Subsequent Years**

<i>Structural Measure Reporting</i>	<i>Estimated time per record (minutes)</i>	<i>Number reporting quarters per year</i>	<i>Number of hospitals reporting</i>	<i>Average number records per hospital per quarter</i>	<i>Annual burden (hours) per hospital</i>	<i>Total Annual Hours for all hospitals</i>
<b>FY 2028 Payment Determination and Subsequent Years</b>						
Maternal Morbidity measure (IPPS Hospitals)	5	1	3,050	1	0.083	254
Maternal Morbidity measure (Non-IPPS Hospitals)	5	1	1,500	1	0.083	125
<b>Subtotal Burden Hours</b>						<b>379</b>
Age Friendly Hospital measure (IPPS Hospitals)	10	1	3,050	1	0.167	509
Age Friendly Hospital measure (Non-IPPS Hospitals)	10	1	1,500	1	0.167	250
<b>Subtotal Burden Hours</b>						<b>759</b>
<b>Total Burden Hours</b>						<b>1,138</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$63,022</b>

**(g) Hybrid Measure Reporting and Submission Burden**

We do not expect any additional burden to hospitals to report the claims-based portion of these measures because these data are already reported to the Medicare program for payment purposes. However, we do expect that hospitals will experience burden in reporting the EHR data.

In the FY 2026 IPPS/LTCH PPS proposed rule, we proposed to modify the Hybrid HWR and HWM measure reporting requirements beginning with the FY 2028 payment determination, associated with a July 1, 2025 - June 30, 2026, performance period. This modification would

lower the submission thresholds for both the Hybrid HWR and HWM measures to allow for up to two missing laboratory results and up to two missing vital signs, reduce the core clinical data elements (CCDEs) submission requirement to 70 percent or more of discharges, and reduce the submission requirement of linking variables to 70 percent or more of discharges. The submission of CCDEs and linking variables associated with the Hybrid HWR and Hybrid HWM measures is currently voluntary. Our previously finalized burden estimates assume that all hospitals will participate in order to not underestimate the burden on participating hospitals and account for the submission of CCDEs and linking variables. Therefore, while the proposed modifications are designed to reduce the administrative burden associated with reporting these measures, they would not affect information collection burden estimates as neither the amount of data collected nor frequency of data submission are impacted.

As shown in Table 3 for the FY 2027 payment determination, we currently estimate the information collection burden associated with the reporting of hybrid measures to be 10 minutes (0.167 hours) per measure per quarter for each hospital or 80 minutes (1.33 hours) for both measures annually (10 minutes x 2 measures x 4 quarters). The Hybrid HWR and Hybrid HWM measures use both claims-based data and EHR data, specifically, a set of core clinical data elements consisting of vital signs and laboratory test information and patient linking variables collected from hospitals’ EHR systems. We do not estimate any burden to hospitals to report the claims-based portion of these measures because these data are already reported to the Medicare program for payment purposes. However, we do expect that hospitals will experience burden in reporting the EHR data.

We estimate the annual burden for all 3,050 IPPS hospitals to be 4,067 hours (1.33 hours/hospital x 3,050 IPPS hospitals) at a cost of \$225,212 (4,067 hours x \$55.38). The total annual burden for all 1,500 non-IPPS hospitals is estimated to be 2,000 hours (1.33 hours/hospital x 1,500 non-IPPS hospitals) at a cost of \$110,760 (2,000 hours x \$55.38).

**Table 6. Estimated Burden for Hybrid Measure Reporting and Submission Requirements for the FY 2028 Payment Determination and Subsequent Years**

<i>Hybrid Measure Reporting</i>	<i>Estimated time per record (minutes)</i>	<i>Number reporting quarters per year</i>	<i>Number of hospitals reporting</i>	<i>Average number records per hospital per quarter</i>	<i>Annual burden (hours) per hospital</i>	<i>Total Annual Hours for all hospitals</i>
<b>FY 2028 Payment Determination and Subsequent Years</b>						
Hybrid HWR measure (IPPS Hospitals)	10	4	3,050	1	0.67	2,033
Hybrid HWR measure (Non-IPPS Hospitals)	10	4	1,500	1	0.67	1,000
<b>Subtotal Burden Hours</b>						<b>3,033</b>
Hybrid HWM	10	4	3,050	1	0.67	2,033

measure (IPPS Hospitals)						
Hybrid HWM measure (Non-IPPS Hospitals)	10	4	1,500	1	0.67	1,000
<b>Subtotal Burden Hours</b>						<b>3,033</b>
<b>Total Burden Hours</b>						<b>6,066</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$335,935</b>

**(h) Process Measure Reporting and Submission Burden**

In the FY 2026 IPPS/LTCH PPS proposed rule, we are proposing to remove the Screening for Social Drivers of Health and Screen Positive Rate for Social Drivers of Health measures beginning with the CY 2024 reporting period/FY 2026 payment determination. Because there are no other process measures currently approved for the Hospital IQR program, we estimate no burden associated with reporting or submission of process measures in the FY 2028 payment determination and subsequent years.

**(i) Patient-Reported Outcomes-Based Performance Measure Reporting and Submission Burden**

We are not proposing any changes to the reporting or submission requirements for PRO-PM measures in the FY 2026 IPPS/LTCH PPS proposed rule. As shown in Table 3 for the FY 2027 payment determination, we continue to estimate the burden per respondent to complete the pre-operative and post-operative questionnaires is 7.25 minutes (0.121 hours). For the data submission which is reported via the HQR System, we continue to estimate a burden of 10 minutes (0.167 hours) per response.

The Hospital-Level THA/TKA PRO-PM uses four sources of data for the calculation of the measure: (1) PRO data; (2) claims data; (3) Medicare enrollment and beneficiary data; and (4) U.S. Census Bureau survey data. We estimate no additional burden associated with claims data, Medicare enrollment and beneficiary data, and U.S. Census Bureau survey data as these data are already collected via other mechanisms.

Hospitals have multiple options for when and how they collect PRO data so they can best determine the mode and timing of collection that works best for their patient population. The possible patient touchpoints for pre-operative PRO data collection include the doctor’s office, pre-surgical steps such as education classes, or medical evaluations that can occur in an office or at the hospital. The modes of PRO data collection can include completion of the pre-operative surveys using electronic devices (such as an iPad or tablet), pen and paper, mail, phone call, or through the patient’s portal. Post-operative PRO data collection modes are similar to pre-operative modes. The possible patient touchpoints for post-operative data collection can occur before the follow-up appointment, at the doctor’s office, or after the follow-up appointment. The potential modes of PRO data collection for post-operative data are the same as for pre-operative data. If the patient does not or cannot attend a follow-up appointment, the modes of collection can include completion of the post-operative survey using email, mail, phone, or through the patient portal. Use of multiple modes can increase response rates as it allows for different

patient preferences. Participating hospitals need to submit data twice (pre-operative data and post-operative data).

For burden estimation purposes, we assume that most hospitals will likely undertake PRO data collection through a screening tool incorporated into their EHR or other patient intake process. We estimate that approximately 330,000 THA/TKA procedures occur in the inpatient setting each year, and that many patients could complete both the pre-operative and post-operative questionnaires, although from our experience with using this measure in the Comprehensive Joint Replacement model, we are also aware that not all patients who complete the pre-operative questionnaire would complete the post-operative questionnaire. We are not able to accurately distinguish the number of procedures that take place in IPPS hospitals from those conducted in non-IPPS hospitals. As a result, we combine the burden associated with completion of the pre-operative and post-operative surveys. For the FY 2028 payment determination and subsequent years, we estimate a total of 39,875 hours (330,000 patients x 0.121 hours) at a cost of \$1,021,996 (39,875 hours x \$25.63) across all IPPS and non-IPPS hospitals.

With regard to the burden for hospitals to submit measure data, for the FY 2028 payment determination and subsequent years, we estimate a total annual burden of 1,017 hours (0.33 hours x 3,050 IPPS hospitals) at a cost of \$56,321 (1,017 hours x \$55.38) for all IPPS hospitals and a total annual burden of 500 hours (0.33 hours x 1,500 non-IPPS hospitals) at a cost of \$27,690 (500 hours x \$55.38).

**Table 7. Estimated Burden for PRO-PM Measure Reporting and Submission Requirements for the FY 2028 Payment Determination and Subsequent Years**

<i>PRO-PM Measure Reporting</i>	<i>Estimated time per record (minutes)</i>	<i>Number reporting quarters per year</i>	<i>Number of respondents</i>	<i>Average number records per respondent per quarter</i>	<i>Annual burden (hours) per hospital</i>	<i>Total Annual Hours for all respondents</i>
<b>FY 2028 Payment Determination and Subsequent Years</b>						
IPPS and Non-IPPS Hospitals (Survey)	7.25	N/A	330,000	N/A	8.86	39,875
IPPS Hospitals (Reporting)	10	2	3,050	1	0.33	1,017
Non-IPPS Hospitals (Reporting)	10	2	1,500	1	0.33	500
<b>Total Burden Hours</b>						<b>41,392</b>
<b>Total Burden @ Average Individual labor rate (\$25.63/hr)</b>						<b>\$1,021,996</b>
<b>Total Burden @ Medical Records Specialist labor rate (\$55.38/hr)</b>						<b>\$84,011</b>

**(j) Burden for Validation of Hospital IQR Program Measure Data, Population and Sampling for Ongoing Measure Sets, and Reviewing Reports for Claims-Based Measure Sets**

We are not proposing any changes to the information collection requirements for eCQM validation or population and sampling of ongoing measure sets in the FY 2026 IPPS/LTCH PPS proposed rule. As shown in Table 3 for the FY 2027 payment determination, we continue to estimate the information collection burden associated with eCQM validation for CY 2024 reporting period/FY 2027 payment determination and subsequent years to be 10 minutes (0.167 hours) per record for the pool of 400 hospitals selected and assume each selected hospital will submit 8 cases each year. We also continue to estimate the information collection burden associated with population and sampling of ongoing measure sets to be 15 minutes (0.25 hours) per record per quarter and assume each hospital will report four records for four quarters each year.

We estimate the information collection burden per hospital associated with eCQM validation of CY 2024 data impacting the FY 2027 payment determination and for subsequent years to be 2,133 hours across the 400 IPPS hospitals selected for eCQM validation (0.167 hours × 4 quarters × 8 cases × 400 IPPS hospitals) at a cost of \$118,144 (2,133 hours x \$55.38).

We estimate the information collection burden per hospital associated with population and sampling of ongoing measure sets to be 4 hours (15 minutes/record/quarter x 4 records x 4 quarters). For all 4,550 IPPS and non-IPPS hospitals, we estimate a total annual burden of 18,200 hours (4 hours x 4,550 hospitals) at a cost of \$1,007,916 (18,200 hours x \$55.38).

As shown in Table 3, we currently estimate the information collection burden associated with reviewing Hospital-specific reports (HSRs) for claims-based measure sets to be 60 minutes (1 hour) per quarter. HSRs are available for hospitals to download from the Claims-Based Measures page within the HQR Secure Portal. The HSRs contain discharge-level data, hospital-specific results, and state and national results for the claims-based measures. While we believe reviewing these reports is important for hospitals participating in the Hospital IQR program, upon review, we do not believe the time associated with this activity is appropriate for inclusion in our information collection burden estimates as it is both voluntary and does not require hospitals to collect or submit data. Therefore, beginning with the FY 2027 payment determination, we will no longer account for the time associated with this activity in our burden estimates.

### **(k) Burden Associated with Completion of Forms**

Time estimates for activities other than chart-abstraction, including completion of the forms listed in section B.1.b, routine reporting of population and sampling numbers for ongoing chart-abstracted measures, and review of reports were made in consultation with our Hospital IQR Program support contractor, which is responsible for routine interface with hospitals and QIOs regarding Hospital IQR Program requirements. We define “all other forms used in the data collection process” as the forms listed below. As shown in Table 3 and consistent with estimates in the FY 2016 IPPS/LTCH PPS final rule (80 FR 49762), we continue to estimate a burden of 15 minutes (0.25 hours) per hospital to complete applicable forms.

Other than the DACA form, the forms listed in section B.1.b would not be filled out by hospitals on a regular basis. Because the CMS Quality Reporting Program ECE Request Form would be used across eleven quality programs (Hospital IQR Program, Hospital Outpatient Quality Reporting Program, Inpatient Psychiatric Facility Quality Reporting Program, PCHQR Program, Ambulatory Surgical Center Quality Reporting Program, Hospital VBP Program, Hospital-Acquired Condition Reduction Program, Hospital Readmissions Reduction Program, Rural Emergency Hospital Quality Reporting Program, and End Stage Renal Disease Quality Incentive Program), we have included a burden calculation using this form as an example of “all other forms” within this PRA package. This form is intended to be submitted by participants only in the event of an extraordinary circumstance or disaster if they seek an exception from data reporting requirements due to such extraordinary circumstance. For example, in CY 2023, 195 ECE requests were submitted by hospitals for an exception from reporting requirements in the Hospital IQR Program. Based on our estimation of 15 minutes to submit the ECE Request Form, the total burden calculation for the submission of 195 ECE Request Forms was 2,925 minutes (or 48.75 hours) across 3,050 IPPS hospitals. Note that non-IPPS hospitals do not need this form because they participate in quality data reporting on a voluntary basis. We were conservative in our estimate (provided in Table 3 above) of 1,138 hours across all IPPS and non-IPPS hospitals, thus this 48.75 hours ECE Request Form burden estimation is accounted for in that figure.

We estimate the information collection burden per hospital associated with completing all other forms used in the data collection process to be \$13.85 (0.25 hours x \$55.38). For all 4,550 IPPS and non-IPPS hospitals, we estimate a total annual burden of 1,138 hours (0.25 hours x 4,550 hospitals) at a cost of \$62,995 (1,138 hours x \$55.38).

Beginning with the FY 2025 program year, the burden associated with the Measure Exception Form for NHSN HAI Data Submission was accounted for under OMB control number 0938-1352 (expiration date November 30, 2025) for the HAC Reduction Program. We estimate the form requires 10 minutes (0.167 hours) to submit and based on data from previous years, assume 240 hospitals will complete the form annually. As a result, we estimate the burden associated with this form to be 40 hours annually (0.167 hours x 240 hospitals) at a cost of \$2,215 (40 hours x \$55.38). After subtracting this burden from the total burden of 1,138 hours at a cost of \$62,995 for all forms under OMB control number 0938-1022, we estimate a revised total annual burden of 1,098 hours at a cost of \$60,780.

### **(l) Claims-Based Measure Burden**

In the FY 2026 IPPS/LTCH PPS proposed rule, we proposed to modify the COMP-HIP-KNEE measure beginning with the FY 2027 payment determination, associated with the April 1, 2023 - March 31, 2025 performance period and the MORT-30-STK measure beginning with the FY 2027 payment determination, associated with the July 1, 2023 - June 30, 2025 performance period. This proposed modification would include adding MA patients to the current cohort of patients and shortening the performance period from 3 years to 2 years. Claims-based measures are derived through analysis of administrative claims, and encounter data and do not require additional effort or burden on hospitals. As a result, the Hospital IQR Program's claims-based measures (see Table 1) do not influence our burden calculations.

### **(m) Survey Measure Burden**

The information collection requirements associated with HCAHPS Survey measure are currently approved under OMB control number 0938-0981, which expires November 30, 2027. As a result, the policy to require data collection for these measures does not influence our burden calculations. We are not proposing any changes to the information collection requirements for survey measures in the FY 2026 IPPS/LTCH PPS proposed rule.

### **(n) Burden Estimate Summary**

As shown in Tables 8 and 9, in summary, under OMB control number 0938-1022, we estimate a total information collection burden of 1,351,632 at a cost of \$73,667,099 for the CY 2026 reporting period/FY 2028 payment determination. We also estimate an annual decrease of 953,644 hours and \$25,051,078 for 4,550 IPPS and non-IPPS hospitals associated with our proposed policies and updated burden estimates described above related to this information collection (which also reflects use of updated hourly wage rates as previously discussed), from the CY 2026 reporting period/FY 2028 payment determination through the CY 2029 reporting period/FY 2031 payment determination, compared to our currently approved information collection burden estimates. The tables below summarize the total burden changes for each respective FY payment determination compared to our currently approved information collection burden estimates (the columns in each table for the FY 2031 payment determination reflects the cumulative burden changes).

**Table 8. Summary of Annual Burden Hour Estimates for the FY 2027 through FY 2031  
Payment Determination Years**

Information Collection	ANNUAL BURDEN HOURS									
	FY2027	Difference from Currently Approved	FY2028	Difference from Currently Approved	FY2029	Difference from Currently Approved	FY2030	Difference from Currently Approved	FY2031	Difference from Currently Approved
Chart Abstraction										
IPPS	1,220,000	0	1,220,000	0	1,220,000	0	1,220,000	0	1,220,000	0
Non-IPPS	36,200	0	36,200	0	36,200	0	36,200	0	36,200	0
Hybrid Measures										
IPPS	4,067	0	4,067	0	4,067	0	4,067	0	4,067	0
Non-IPPS	2,000	0	2,000	0	2,000	0	2,000	0	2,000	0
Structural Measures										
IPPS	763	-509	763	-509	763	-509	763	-509	763	-509
Non-IPPS	375	-250	375	-250	375	-250	375	-250	375	-250
Reporting eCQMs										
IPPS	12,963	0	17,030	0	19,063	0	23,089	0	23,089	0
Non-IPPS	6,375	0	8,375	0	9,375	0	11,375	0	11,375	0
Process Measures										
IPPS	0	-626,518	0	-626,518	0	-626,518	0	-626,518	0	-626,518
Non-IPPS	0	-308,167	0	-308,167	0	-308,167	0	-308,167	0	-308,167
PRO-PM Measures										
IPPS	25,685	0	40,892	0	40,892	0	40,892	0	40,892	0
Non-IPPS	375	0	500	0	500	0	500	0	500	0
Population and sampling for the ongoing measure sets	18,200	0	18,200	0	18,200	0	18,200	0	18,200	0
Review reports for claims-based measure sets	0	-18,200	0	-18,200	0	-18,200	0	-18,200	0	-18,200
eCQM Validation	2,133	0	2,133	0	2,133	0	2,133	0	2,133	0
All other forms used in the data collection process	1,098	0	1,098	0	1,098	0	1,098	0	1,098	0
<b>TOTAL</b>	<b>1,330,233</b>	<b>-953,644</b>	<b>1,351,632</b>	<b>-953,644</b>	<b>1,354,665</b>	<b>-953,644</b>	<b>1,360,691</b>	<b>-953,644</b>	<b>1,360,691</b>	<b>-953,644</b>









**Table 9. Summary of Annual Burden Cost Estimates for the FY 2027 through FY 2031 Payment Determination Years\***

Information Collection	ANNUAL BURDEN COST									
	FY2027	Difference from Currently Approved	FY2028	Difference from Currently Approved	FY2029	Difference from Currently Approved	FY2030	Difference from Currently Approved	FY2031	Difference from Currently Approved
Chart Abstraction										
IPPS	\$67,563,600	\$0	\$67,563,600	\$0	\$67,563,600	\$0	\$67,563,600	\$0	\$67,563,600	\$0
Non-IPPS	\$2,004,756	\$0	\$2,004,756	\$0	\$2,004,756	\$0	\$2,004,756	\$0	\$2,004,756	\$0
Hybrid Measures										
IPPS	\$225,212	\$0	\$225,212	\$0	\$225,212	\$0	\$225,212	\$0	\$225,212	\$0
Non-IPPS	\$110,760	\$0	\$110,760	\$0	\$110,760	\$0	\$110,760	\$0	\$110,760	\$0
Structural Measures										
IPPS	\$42,255	(\$28,188)	\$42,255	(\$28,188)	\$42,255	(\$28,188)	\$42,255	(\$28,188)	\$42,255	(\$28,188)
Non-IPPS	\$20,768	(\$13,845)	\$20,768	(\$13,845)	\$20,768	(\$13,845)	\$20,768	(\$13,845)	\$20,768	(\$13,845)
Reporting eCQMs										
IPPS	\$717,863	\$0	\$943,094	\$0	\$1,055,681	\$0	\$1,278,641	\$0	\$1,278,641	\$0
Non-IPPS	\$353,048	\$0	\$463,808	\$0	\$519,188	\$0	\$629,948	\$0	\$629,948	\$0
Process Measures										
IPPS	\$0	(\$16,087,942)	\$0	(\$16,087,942)	\$0	(\$16,087,942)	\$0	(\$16,087,942)	\$0	(\$16,087,942)
Non-IPPS	\$0	(\$7,913,187)	\$0	(\$7,913,187)	\$0	(\$7,913,187)	\$0	(\$7,913,187)	\$0	(\$7,913,187)
PRO-PM Measures										
IPPS**	\$681,003	\$0	\$1,078,318	\$0	\$1,078,318	\$0	\$1,078,318	\$0	\$1,078,318	\$0
Non-IPPS	\$20,768	\$0	\$27,690	\$0	\$27,690	\$0	\$27,690	\$0	\$27,690	\$0
Population and sampling for the ongoing measure sets	\$1,007,916	\$0	\$1,007,916	\$0	\$1,007,916	\$0	\$1,007,916	\$0	\$1,007,916	\$0
Review reports for claims-based measure sets	\$0	(\$1,007,916)	\$0	(\$1,007,916)	\$0	(\$1,007,916)	\$0	(\$1,007,916)	\$0	(\$1,007,916)
eCQM Validation	\$118,144	\$0	\$118,144	\$0	\$118,144	\$0	\$118,144	\$0	\$118,144	\$0
All other forms used in the data collection process	\$60,780	\$0	\$60,780	\$0	\$60,780	\$0	\$60,780	\$0	\$60,780	\$0
<b>TOTAL</b>	<b>\$72,926,871</b>	<b>(\$25,051,078)</b>	<b>\$73,667,099</b>	<b>(\$25,051,078)</b>	<b>\$73,835,066</b>	<b>(\$25,051,078)</b>	<b>\$74,168,786</b>	<b>(\$25,051,078)</b>	<b>\$74,168,786</b>	<b>(\$25,051,078)</b>

\* Cost estimates are based on updated wage rates. Differences from currently approved burden account for updating estimates of currently approved hours to the new wage rates.

\*\* Includes burden associated with surveys completed by patients receiving care at non-IPPS hospitals (see Section B.12.i)

### **(o) Information Collection Instruments/Instructions**

In addition to the administrative forms discussed in section B.1.b, the Hospital IQR Program uses three additional information collections forms: the Maternal Morbidity Structural Measure Form, the eCQM Denominator Declaration Form, and the Population and Sampling Form. The following forms will be revised and submitted with this PRA package:

- The Hospital Quality Reporting Data Accuracy and Completeness Acknowledgement form is being resubmitted to update the bullet points to match the groupings used elsewhere.
- The Hospital Compare Request Form for Withholding/Footnoting Data for Public Reporting is being resubmitted to (1) add the Rural Emergency Hospital Quality Reporting Program and (2) remove content related to the Social Drivers of Health measures proposed for removal.
- The CMS Quality Reporting Program APU Reconsideration Request Form is being resubmitted to place “name” and “title” on separate lines to address a common mistaken omission we see when receiving data.
- The CMS Quality Program Extraordinary Circumstances Exceptions (ECE) Request Form is being resubmitted for updated instructions, revised deadlines, and to reflect the proposal to offer deadline extensions rather than full exception from the program.
- The eCQM Denominator Declaration form is being resubmitted to update the screenshot of the data form the measures, the measure names, and the order of the measures to align with changes made in the HQR System.
- CMS is proposing to remove the Social Drivers of Health and Hospital Commitment to Health Equity measures. The removal of the forms associated with these measures will affect information collection burden under this OMB control number.

The following information collection forms will continue to be used without any modifications and are not being revised with this PRA package:

- Hospital Inpatient Quality Reporting Notice of Participation
- CMS Hospital IQR Program Validation Review for Reconsideration Request Form
- Maternal Morbidity Structural Measure Form
- Population and Sampling Form
- Hospital Quality Reporting Data Validation Educational Review Form
- THA/TKA Patient-Reported Outcome-based Performance Measure Form
- Hospital Value-Based Purchasing (VBP) Program Appeal Request Form

### **13. Capital Costs (Maintenance of Capital Costs)**

While we assume the majority of hospitals will report data for the Hospital-Level THA/TKA PRO-PM measure via CMS' HQR System, we assume some hospitals may elect to submit measure data via a third-party CMS-approved survey vendor, for which there are associated costs. Under OMB control number 0938-0981 for the HCAHPS Survey measure (expiration date November 30, 2027), an estimate of approximately \$4,200 per hospital is used to account for these costs.

### **14. Cost to Federal Government**

The cost to the Federal Government for maintaining program activities is for supporting data system architecture, data storage, maintenance and updating of information technology infrastructure on the HQR system secure portal, providing ongoing technical assistance to hospital and data vendors, calculation of claims-based measures and validation, measure development and maintenance, the provision of hospitals with feedback and preview reports, as well as costs associated with public reporting. These costs are estimated at \$10,050,000 annually for the validation and quality reporting contracts. Additionally, this program requires three CMS staff at a GS-13 Step 5 level with approximate annual salaries of \$136,658 plus benefits (30%) of \$40,997 per staff member to operate for an additional cost of \$532,965. The total annual cost to the Federal Government is \$10,582,965.

For the claims-based measures, the cost to the Federal Government is minimal. CMS uses data from the CMS National Claims History system that are already being collected for provider reimbursement; therefore, no additional data will need to be submitted by hospitals for claims-based measures.

## **15. Program or Burden Changes**

We previously requested and received approval for total annual burden estimates under this OMB control number for the CY 2026 reporting period/FY 2028 payment determination of 2,305,276 hours at a total cost of approximately \$92.8 million as a result of policies finalized in the FY 2025 IPPS/LTCH PPS final rule. Accounting for updated wage rates, the total cost of \$92.8 million increases to \$98.7 million. For the CY 2026 reporting period/FY 2028 payment determination, based on the policies in the FY 2026 IPPS/LTCH PPS proposed rule, we estimate a total burden of 1,351,632 hours and \$73,667,099 (a decrease of 953,644 hours and \$25,051,078 from our estimate in the FY 2025 IPPS/LTCH PPS final rule). This burden estimate also represents a decrease of 932,246 hours and \$18,465,446 from the currently approved burden estimate of 2,283,878 hours and \$92,132,545 for the CY 2025 reporting period/FY 2027 payment determination.

The proposal in the FY 2026 IPPS/LTCH PPS proposed rule to remove the Hospital Commitment to Health Equity measure beginning with the FY 2026 payment determination results in an annual burden decrease of 759 hours and \$42,033. The proposals to remove the Screening for Social Drivers of Health and Screen Positive Rate for Social Drivers of Health result in an annual burden decrease of 934,685 hours and \$24,001,129. The adjustment to remove the burden hours associated with reviewing HSRs for claims-based measure sets results in a decrease of 18,200 hours and \$1,007,916. The aggregate decrease due to these policies and adjustments is 953,644 hours (-759 – 934,685 - 18,200) and \$25,051,078 (-\$42,033 - \$24,001,129 - \$1,007,916) as shown in Tables 8 and 9.

## **16. Publication/Tabulation Dates**

The goal of the data collection is to tabulate and publish hospital-specific data. We will continue to display hospital quality information for public viewing as required by Social Security Act sections 1886(b)(3)(B)(viii)(VII) for the Hospital IQR Program, 1886(o)(10) for the Hospital VBP Program, 1886(p)(6) for the HAC Reduction Program, 1886(q)(6) for the Hospital Readmissions Reduction Program, and 1886(n)(4)(B) for the Medicare Promoting Interoperability Program. Hospital data from these initiatives are currently used to populate the Compare tool hosted by HHS, available at: <https://www.medicare.gov/care-compare/>, or its successor website(s). Data are presented on the Compare tool in a format mainly aimed towards consumers, patients, and the general public, providing access to hospital-specific quality measure performance rates along with state and national performance rates. For certain outcome and cost measures, data are presented on the Compare tool in performance categories of Better, No Different, or Worse than the National Rate. More detailed measure data, including the data used for the Compare tool, are also available to the public as downloadable files at <https://data.medicare.gov>. Hospital quality data on the Compare tool are currently updated on a quarterly basis. One of the goals of the Hospital IQR Program is to publicly display data on all measures adopted for the Program. We note, however, that in certain circumstances we may decide to delay public display as we evaluate the accuracy of the measure data.

**17. Expiration Date**

We will display the approved expiration date on each of the forms included as appendices to this PRA, which would become available on the *QualityNet* website (<https://qualitynet.cms.gov>). We will also display the approved expiration date prominently on the *QualityNet* website's Hospital IQR Program pages used to document our measure specifications and reporting guidance.

**18. Certification Statement**

We are not claiming any exceptions to the Certification for Paperwork Reduction Act Submissions Statement.