

**Table 1: PRA Instrument Changes**

| Instrument          | Description                                                                                                                                                                                                                                                     | Same, Change, or New | Explanation of Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Burden Impact |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Phase 1 Application | The Phase 1 Application is an online form where entities attest information on organizational structure, ability to meet Phase 1 requirements, and access to additional Medicare claims data sources. Entities upload supporting evidence to the online portal. | Change               | <ul style="list-style-type: none"> <li>Elements 1.1 and 1.4 were updated to add attestations about if the applicants' qualifying data is beneficiary identified. This is collected via a question in the Data Source Attestation (Element 1.4) for QEs and as a question in Element 1.1 for Quasi-QEs. This change was implemented to align with changes to the DUA Specifications Worksheet. Organizations must now provide justification to obtain Bene-MBI and Bene-SSN Crosswalks on their QE DUAs.</li> <li>A question was added to the Data Source Attestation to collect the years of historical data an applicant already possesses from their other payer data set. This was implemented to ensure that an organization requesting multiple years of historic Medicare data has the corresponding years of other-payer data to combine it with.</li> <li>A question was added to have an organization explain any discrepancies between the total covered lives by data suppliers versus the total lives broken down by geography. This was implemented as a way of verifying that applicants are appropriately calculating their covered lives counts within program expectations.</li> </ul> | No impact     |



| Instrument                      | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Same, Change, or New | Explanation of Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Burden Impact |
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| Phase 1 Letter of Commitment    | <p>The Phase 1 Letter of Commitment is a template an entity completes to state commitment to program requirements attesting to the following items:</p> <ul style="list-style-type: none"><li>• Ability to submit public reports</li><li>• Partnership organization details</li><li>• Compliance with federal data use requirements</li><li>• Cloud service provider information</li><li>• Quality Improvement Organization (QIO) contract obligation</li></ul> | Change               | <ul style="list-style-type: none"><li>• A new Attachment was added to the Quasi-QE Letter of Commitment to determine if the applicant's QCDR provides identifiable data. Please see the first bullet in the row above for the explanation of why this change was implemented.</li></ul>                                                                                                                                                                                                                                                                                                 | No impact     |
| Phase 1 Data Source Attestation | <p>The Phase 1 Data Source Attestation is a workbook where an entity defines their data sources. Each entity specifies the following:</p> <ul style="list-style-type: none"><li>• Types of data they will use</li><li>• Data supplier information</li><li>• Analysis level (regional or provider-identified)</li><li>• Calculation of Medicare-covered lives in data selection</li></ul>                                                                        | Change               | <ul style="list-style-type: none"><li>• One question was added to the Data Supplier tab of the DSA to determine what years of data an applicant has in their covered lives. Please see the second bullet of the "Phase 1 Application" row above for the explanation of why the change was implemented.</li><li>• One question was added to the Data Supplier tab of the DSA to determine if a data supplier provided beneficiary identified claims. Please see the first bullet of the "Phase 1 Application" row above for the explanation of why the change was implemented.</li></ul> | No impact     |

| Instrument                           | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Same, Change, or New | Explanation of Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Burden Impact |
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| Annual Report Worksheet              | <p>The Annual Report Worksheet is an online form where an entity provides annual counts of measures calculated, public reports, non-public analysis, and other required information. Depending on QE responsibilities, an entity reports some or all the following data:</p> <ul style="list-style-type: none"> <li>• Background and Volumes of Claims Data</li> <li>• Number of Performance Measures</li> <li>• Public Use of Performance Reports</li> <li>• Provider Requests for Corrections or Appeals</li> <li>• Response to Requests</li> <li>• Non-Public Analyses</li> <li>• Data</li> <li>• Opportunity for Feedback</li> </ul> | Change               | <ul style="list-style-type: none"> <li>• We would like to change the current text on Table 6A and replace it with 4 attestations. Currently, the text directs organizations to review their DSR and make updates to become compliant with CMS Acceptable Risk Safeguards Version 5.1. That text was only needed for last years ARW as all QEs have now completed the update. The attestations we are proposing to replace the current text with would ask organizations about if changes have been made to 4 key security areas rather than ask them to review their entire data security application as per the current language.</li> <li>• We would like to change some of the current optional feedback question on Table 9. We believe we can ask different questions which could lead to more impactful feedback for the program. With the proposed changes, we would plan to remove less-significant questions and replace them with new questions for a net zero difference in the number of questions being asked of the organizations.</li> </ul> | No impact     |
| Phase 3 Measure Information Workbook | <p>The Measure Information Workbook is an online form where an entity provides detailed descriptions of the health care performance measures they plan to report. An entity provides information on measure types, selection rationale, and usage.</p>                                                                                                                                                                                                                                                                                                                                                                                   | Same                 | <ul style="list-style-type: none"> <li>• N/A</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | No change     |

| Instrument                                | Description                                                                                                                                                                                                                                                                | Same, Change, or New | Explanation of Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Burden Impact |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Public Reporting Extension Request Letter | The Public Reporting Extension Request Letter is a template an entity completes to request a reporting deadline extension. Entities provide rationale for requiring an extension and an updated timeline.                                                                  | Change               | <p>The following changes were made to the Extension Request Letter based on updated program guidance established by the QECF Team and CMS in TAG #15: Public Reporting Extension Guidelines:</p> <ul style="list-style-type: none"> <li>• An attestation that the QE has not engaged in additional permissible uses and, if applicable, an explanation of what the data has been used for since receipt. This was added as CMS determined that extensions would not be granted to organizations who have engaged in other types of reporting (non-public analyses or data sharing) with the data.</li> <li>• An attestation that the QE will not engage in additional permissible uses until the public report has been published. This restriction was added to ensure that a QE stays focused on the primary program purpose of public reporting.</li> <li>• Removal of a question asking QEs to outline their additional permissible uses. As explained under the first bullet of this section, additional permissible uses would disqualify the QE from receiving an extension so this information is no longer needed.</li> </ul> | No impact     |
| Phase 2 Data Security Review              | The Phase 2 Data Security Review is a form where an entity attests to compliance with specific CMS Acceptable Risk Safeguards (ARS) security controls. Each entity provides organization details, data storage information, and rationale for each security control group. | Change               | <ul style="list-style-type: none"> <li>• We re-organized questions with the Data Security Review (DSR). We noticed that questions specific to an organization's CSP and Data Custodian were split across Sections A and E of the DSR. We re-organized the DSR so all questions specific to a particular topic were found in the same place.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No impact     |



## PRA Instrument Changes

| Instrument    | Description                                                                                                                                                                                         | Same, Change, or New | Explanation of Change                                                                                                                                                                                                                                                                                                                                                                                                     | Burden Impact |
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| Reapplication | Reapplication is an online form where an entity attests organization details, changes to security procedures, and public reporting plans. Entities upload supporting evidence to the online portal. | Change               | <ul style="list-style-type: none"><li>The language for one attestation was updated to reflect updates made in the QECP Program Guide. This change was implemented to ensure consistency across resources for the explanation of requirements. The change reflects that Statement 5 of the Reapplication aligns with Program requirements for Element 2.2, not Elements 2.3 and 2.4 as was previously indicated.</li></ul> | No impact     |