



DATE: May 14, 2020 Plan Letter 20-01
TO: All Covered California Qualified Health Plan (QHP) Issuers
FROM: James DeBenedetti, Director, Plan Management
SUBJECT: Quality Rating System Reporting for Measurement Year 2019 Due To COVID-19

The purpose of this policy memo is to detail Covered California's quality measurement and reporting approach to guide Issuer submission of Measurement Year (MY) 2019 data given the public health emergency resulting from COVID-19.

BACKGROUND

On April 18, 2020, the Centers for Medicare and Medicaid Services (CMS) announced the suspension of the federal Quality Rating System (QRS) and discontinuation of quality data submissions.¹ The National Committee for Quality Assurance (NCQA) has directed accredited health plans to submit 2019 Healthcare Effectiveness Data Information Set (HEDIS) and Consumer Assessment of Healthcare Providers and Systems (CAHPS) data, with specific allowances for hybrid measure submissions. While NCQA has reported that it will not use the data to report health plan ratings, it has not yet determined if the 2019 HEDIS data will be scored for Quality Compass reporting. However, NCQA has determined that they will not report CAHPS results this year.²

On April 30, 2020, the California Department of Health Care Services (DHCS) announced adjustments to its measures reporting requirements for MY 2019 Managed Care Accountability Set measures.³ These adjustments provide options for Managed Care Plans reporting of HEDIS hybrid measures, allowing reporting of either MY 2018 or MY 2019 data for Reporting Year 2020, while maintaining the standard reporting of HEDIS administrative measures.

Covered California is committed to being sure that our enrollees are receiving appropriate care **and** with ensuring that quality data collection and measurement can be done without increasing the risk of COVID-19 infection or adding burden to the health plans or providers in ways that could inhibit their capacity to respond to the pandemic. The policy we are adopting is based on our engagement with our contracted health

¹ More information on CMS policies related to COVID-19 is available at the following link:
<https://www.cms.gov/files/document/covid-qrs-and-marketplace-quality-initiatives-memo-final.pdf>

² More information on NCQA's policies related to COVID-19 is available at the following link:
https://www.ncqa.org/covid/?utm_medium=email&utm_source=sf&utm_campaign=covid-digest&utm_term=20200326

³ More information on DHCS policies related to COVID-19 is available at the following link:
<https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2019/APL19-017QISupp.pdf>

plans that have all provided assurances that these safety and capacity objectives can be upheld while finishing the HEDIS data collection that was largely done prior to the COVID-19 outbreak. However, individual plan's experiences with the CAHPS work differs as there may be data collection impact caused by the pandemic and data validity uncertainties. Given these uncertainties, Covered California has not determined the extent to which 2019 CAHPS results will be valid. We will determine this after the survey fielding period ends in mid-May.

POLICY

As a State-Based Exchange, Covered California has long exercised its right under the Affordable Care Act to manage the QRS program, in consultation with stakeholders, according to our own priorities. For Performance Year 2019, Covered California will maintain the obligation of its health plans to collect Issuer QRS measure data. Covered California plans to use these results in its health plan oversight, consumer decision-support, and healthcare quality improvement activities. However, recognizing the pandemic's impact and in alignment with the DHCS and NCQA, our current plan is to adjust the MY 2019 data collection and quality performance scoring as follows:

- QHPs will submit MY 2019 measures data directly to Covered California using a template to be circulated in June.
- The Plan Year 2021 QRS Star Ratings (to be released this fall) will be calculated using a Covered California methodology that was used to produce the MY 2018 ratings.
- For the Plan Year 2021 QRS Star Rating, Covered California will apply a "QHP Best of" MY 2018 or MY 2019 measure score that will be used.
- The ratings will be computed using the Covered California adopted MY 2018 QRS national percentile cut points.

ENSURING QUALITY CARE IN COVID-19 ERA

Covered California is working to track and respond to any COVID-19 impacts that could jeopardize the quality of care for our enrolled members. While the MY 2019 data reporting approach leverages quality measurement work aimed at care rendered prior to the onset of COVID-19, Covered California urges, and will partner with, Issuers to work creatively with their contracted networks in the face of adversity to ensure continued delivery of quality care. The pandemic's disruption to getting the right care at the right time is seen across many healthcare services, including the striking example of an estimated 50% decrease in childhood immunization rates. Covered California will continue its quality measurement activities this year and work with its Issuers and healthcare providers on multiple fronts to counter the pandemic's threat to the quality of patient care.

Please contact your Plan Manager if you have any questions regarding this communication.