

# The Next Era of Patient Safety

Evolving Hospital Harm eCQMs and  
What it Means for You



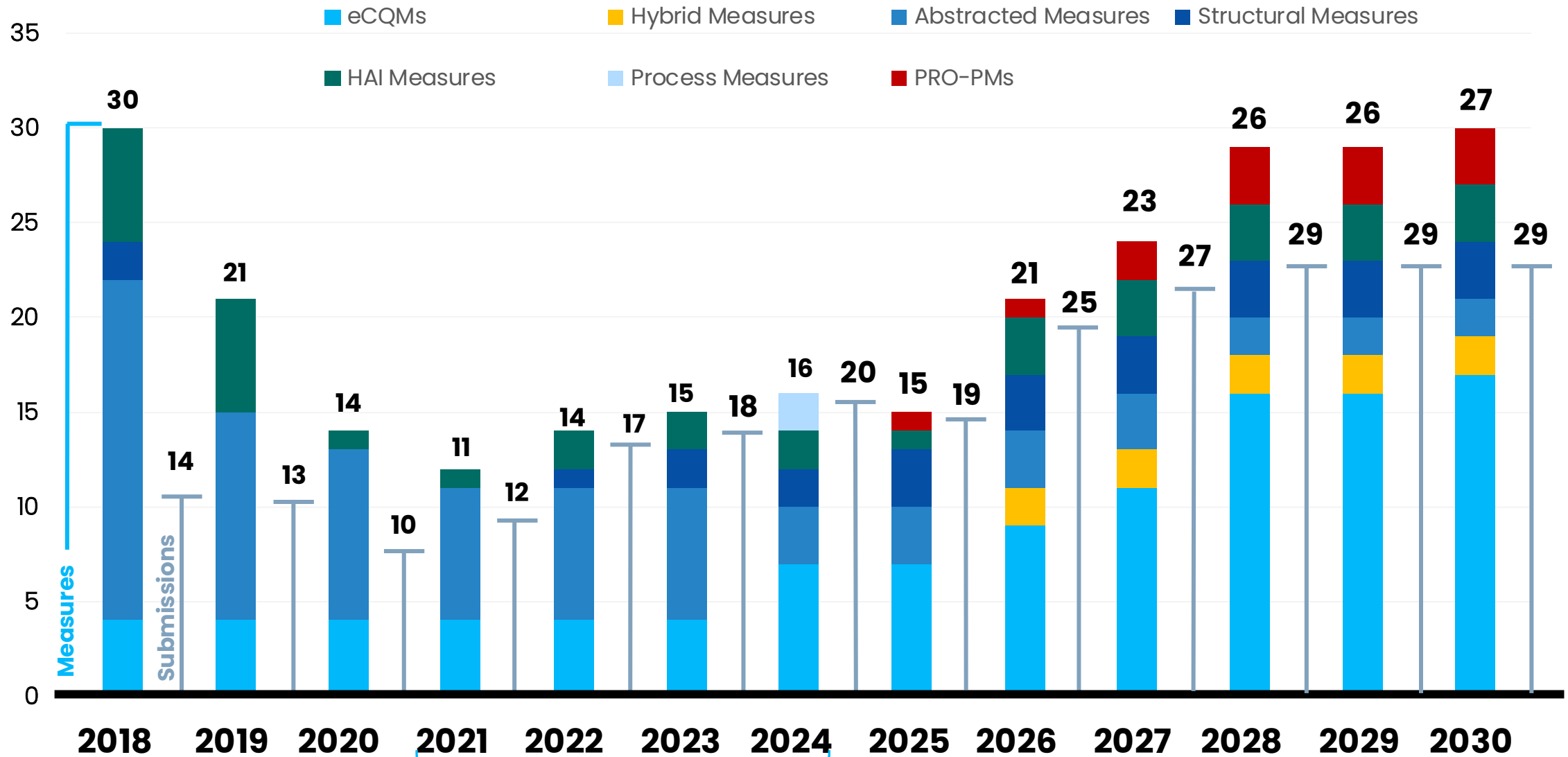
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Erin Heilman is a distinguished leader in the healthcare quality regulatory space, known for her innovative approach to simplifying complex regulations. For over a decade, Erin has developed award-winning content, including articles, guides, and tools that empower quality leaders to excel in their reporting obligations.

# Learning Objectives

01. Understanding CMS's Shift to Safety
02. Technical Review of Hospital Harm eCQMs
03. Getting Started (or Restarted) with eCQMs
04. Improving eCQM Results
05. Management Planning

# CMS IQR & OQR Programs Proposed



Current Public Reputation Reflects 2021 – 2024

# A Short History of Safety Measures

**NHSN Develops Hospital-Acquired Infection (HAI) Measures**

*1970s - 1980s*

**AHRQ Develops Quality Indicators (QIs)**

*1990s*

**To Err is Human**

*1999*

**AHRQ Releases Patient Safety Indicators (PSIs)**

*2003 (Cannot Track Adverse Drug Events)*

**Safety Metrics Worsened**

*2020*

**CMS Releases Their Strategic Plan to Reduce Patient Harm**

*2021*

**CMS Releases the First Hospital Harm eCQM**

*2022*

**Hospital Harm eCQMs Required**

*BY 2028*

# Hospital Harm eCQMs: Proposed Mandatory Reporting

CMS is moving from PSI-90 (claims-based) to Hospital Harm measures pulled directly from the EHR. These measures track what actually happened to patients, not whether a process was followed.

### IMPACT

Performance now depends on documentation quality and clean EHR data. Weak data, weak scores.

### Timeline Pattern



### Newly Mandated

Falls with injury	Mandatory CY 2028
Post-op respiratory failure	Mandatory CY 2028
Post-op VTE	Mandatory CY 2030

**CMS is developing a new hospital harm eCQM composite to address limitations in the current PSI 90 claims-based composite. While PSI 90 offers a standardized view of hospital patient safety using weighted, risk-adjusted components, it lacks clinical detail, is based solely on Medicare fee-for-service claims, and has significant delays due to a six-month post-submission validation period—making it less actionable for hospitals.**

**Summary of Hospital Harm Technical Expert Panel (TEP) Evaluation of Measures (Deliverable 4-3)**

**“By making the Hospital Harm eCQMs mandatory after 2 years of self-selected reporting, we ensure that we would receive a robust national dataset for measures on these important topics, and these measures could serve as potential replacements for claims-based measures, such as those reported within the Patient Safety and Adverse Events Composite (PSI 90).”**

**– CMS 2027 IPPS Proposed Rule**

# Hospital Harm eCQM / PSI Crosswalk

## Hospital Harm Composite (PSI-90 equivalent)

## PSIs

Adverse Drug Events

HH-Hyperglycemia

No Coordinating PSI

HH-Hypoglycemia

No Coordinating PSI

HH-Opioid-Related Adverse Event

No Coordinating PSI

HH-Pressure Injury

PSI 03 Pressure Ulcer Rate

HH-Acute Kidney Injury

PSI 10 Postoperative Acute Kidney Injury Requiring Dialysis Rate

HH-Post-Respiratory Failure

PSI 11 Postoperative Respiratory Failure Rate

HH-Falls with Injury

PSI 08 In-Hospital Fall-Associated Fracture Rate

HH - Anticoagulant-Related Major Bleeding *Under development. Not released.*

PSI 09: Postoperative Hemorrhage or Hematoma Rate

**HH - Postoperative Venous Thromboembolism**

**PSI 12 Perioperative Pulmonary Embolism or Deep-Vein Thrombosis Rate**

# 2027 IPPS Proposed Rule: Electronic Clinical Quality Measures

Short Name	2026	2027	2028	2029	2030
PC-02	Required	Required	Required	Required	Required
PC-07	Required	Required	Required	Required	Required
CMS506	Required	Required	Required	Required	Required
HH-Hyper	Required	Required	Required	Required	Required
HH-Hypo	Required	Required	Required	Required	Required
HH-ORAE	Available	Required	Required	Required	Required
HH-PI	Available	Available	Required	Required	Required
HH-AKI	Available	Available	Required	Required	Required
HH-RF	Available	Used for TEAM	Required	Required	Required
HH-FI	Available	Used for TEAM	Required	Required	Required
HH-VTE	-	-	Available	Available	Required
STK-02	Available	Available	-	-	-
STK-03	Available	Available	Available	Available	Available
STK-05	Available	Available	Available	Available	Available
VTE-1	Available	Available	-	-	-
VTE-2	Available	Available	-	-	-
MCS	Available	Available	Required	Required	Required
IP-ExRad	Available	Available	Available	Available	Available
Advance Care Plan	-	-	Available	Available	Available

**TEAM's quality measures focus on care coordination, patient safety, and patient reported outcomes which we believe represent areas of quality that are particularly important to patients undergoing acute procedures.**

# TEAM Quality Measures

Measure Title	Eligible Episodes	Performance Years (PY)	Sourced From
Hybrid Hospital-Wide Readmission	All	PY 1-5	Inpatient Quality Reporting (IQR)
THA/TKA PRO-PM	LEJR episodes only	PY 1-5	Inpatient Quality Reporting (IQR)
PSI 90	All	PY 1	HAC Reduction Program
HH-Falls w/ Injury	All	PY 2-5	Inpatient Quality Reporting (IQR)
HH-Postoperative Respiratory Failure	All	PY 2-5	Inpatient Quality Reporting (IQR)
Failure to Rescue	All	PY 2-5	Inpatient Quality Reporting (IQR)
Information Transfer PRO-PM	HOPD – LEJR + Spinal Fusion	PY 3-5	Outpatient Quality Reporting (OQR)



# **CMS 2026 OPPS changes to the Hospital Quality Star Ratings:**

## **CY 2026**

**Apply a cap of 4 stars to any hospital that is initially assigned 5 stars but has a Safety of Care score in the lowest-performing quartile (based on at least three Safety of Care measures).**

## **CY 2027**

**CMS will reduce the Overall Hospital Quality Star Rating of any hospital in the lowest quartile of the Safety of Care measure group by 1 star, to a minimum 1-star rating (based on at least three measure scores).**

# Star Ratings Measure List

Category: Safety of Care

Measure ID	Measure name
COMP-HIP-KNEE	Hospital-Level Risk-Standardized Complication Rate (RSCR) Following Elective Primary Total Hip Arthroplasty (THA) and Total Knee Arthroplasty (TKA)
HAI-1	Central-Line Associated Bloodstream Infection (CLABSI)
HAI-2	Catheter-Associated Urinary Tract Infection (CAUTI)
HAI-3	Surgical Site Infection from Colon Surgery (SSI-colon)
HAI-4	Surgical Site Infection from Abdominal Hysterectomy (SSI-abdominal hysterectomy)
HAI-5	MRSA Bacteremia
HAI-6	Clostridium Difficile (C.difficile)
<b>PSI 90</b>	<b>Patient Safety and Adverse Events Composite</b>

# A Review of the Hospital Harm eCQMs

# **CMS 816 / HH-Hypo Hospital Harm – Severe Hypoglycemia**

Required in 2026

## Hospital Harm – Severe Hypoglycemia

# HH-Hypo

This measure focuses on severe hypoglycemia as an outcome in the hospital inpatient setting. In a study published by the Office of the Inspector General, adverse drug events represented 43% of all adverse events in hospitals among Medicare patients; of those events, *hypoglycemia was among the top 5 adverse drug events*. Inpatient hypoglycemia can be life-threatening and is associated with longer hospital stays and increased medical costs.

The measure assesses the number of inpatient hospitalizations for patients age 18 and older who were administered at least one hypoglycemic medication during the encounter and who suffer the harm of a severe hypoglycemic event during the encounter.

**Inverse Measure:** Yes

**Risk Adjusted:** No

**Required:** Yes

# CMS 816 / HH-Hypo

## INVERSE MEASURE

### Initial Population / Denominator

- Inpatient Encounter
- ≥18 years of age
- At least one hypoglycemic medication administered during the encounter

### Numerator

- A Severe Hypoglycemic Event, which is defined as
  - A blood glucose result <40 mg/dL AND
  - A hypoglycemic medication given within 24 hours before the blood was collected for the glucose test AND
  - No subsequent repeat blood glucose test with a result >80 mg/dL occurs within 5 minutes after the initial glucose test result <40 mg/dL.
- Only one qualifying severe hypoglycemic event is counted in the numerator, and only one severe hypoglycemic event is counted per encounter.
- The 24-hour and 5-minute timeframes are based on the time the blood glucose was drawn, since this reflects the time that the patient was experiencing that specific blood glucose level.

*No Exclusions or Exceptions*

# **CMS 871 / HH-Hyper Hospital Harm – Severe Hyperglycemia**

Required in 2026

## Hospital Harm – Severe Hyperglycemia

# HH-Hyper

Hyperglycemia, i.e., elevated glucose level, is common among hospitalized patients, especially those with preexisting diabetes and accounts for over 30% of noncritically ill hospitalized patients. Hyperglycemia can also affect individuals with no prior history of diabetes and may be induced by medications such as steroids, or parenteral or enteral feeding. Severe hyperglycemia, is significantly associated with a range of harms, including increased in-hospital mortality, infection rates, and hospital length of stay.

Assesses the number of inpatient hospital days with a hyperglycemic event (harm) per the total qualifying inpatient hospital days for that encounter.

**Inverse Measure:** Yes

**Risk Adjusted:** No

**Required:** Yes

# CMS 871 / HH-Hyper

## Initial Population / Denominator

- Inpatient encounter
- $\geq 18$  years of age
- Any one of the following:
  - Diagnosis of diabetes that starts before the end of the encounter
  - Administration a hypoglycemic medication that starts during the encounter
  - Presence of at least one blood glucose result  $\geq 200$  mg/dL at any time during encounter

## Exclusions

- Glucose result of  $> 600$  mg/dL that occur 1 hour prior to the start of the encounter (ED, OBS or IN) to 6 hours after the start of the encounter
- Comfort care measures ordered or provided during the encounter.
- Discharge disposition to home for hospice care or to a health care facility for hospice care.

## Numerator

- Hyperglycemic event within first 10 days of the encounter minus the first 24 hours, and minus the last period before discharge if  $< 24$  hours. Hyperglycemic event defined as:
  1. A day with a blood glucose value  $> 300$  mg/dL; OR
  2. A day where a glucose test and result was not found, and it was immediately preceded by two contiguous, consecutive days where at least one glucose value during each of the two days was  $\geq 200$  mg/dL

# **CMS 819 / HH-ORAE**

# **Opioid Related Adverse Events**

Voluntary reporting for CMS IQR in 2026; Required in 2027

## Hospital Harm – Opioid Related Adverse Events

# HH-ORAE

Opioids are often the foundation for sedation and pain relief. Opioid-based analgesia continues to be the most common treatment in postoperative pain management, with more than 95% of surgical patients receiving opioids during their hospitalization. However, use of opioids can also lead to serious adverse events, including constipation, over sedation, delirium, and respiratory depression. Opioid-related adverse events have both patient-level and financial implications. The presence of an ORAE was associated with a 55% longer postoperative length of stay, 29% lower odds of discharge home, and 2.9 times the odds of death. Patients who experienced ORAEs while in the hospital were more likely to have received a higher total dose of opioids during hospitalization.

This measure assesses the number of inpatient hospitalizations for patients age 18 and older who have been administered an opioid medication outside of the operating room and are subsequently administered a non-enteral opioid antagonist outside of the operating room within 12 hours, an indication of an opioid-related adverse event.

**Inverse Measure:** Yes

**Risk Adjusted:** No

**Required 2026:** No (Mandatory 2027)

# CMS 819 / HH-ORAE

## Initial Population / Denominator

- Inpatient Encounter
- $\geq 18$  years of age
- Opioid administration during the encounter

## Exclusions / Exceptions

- None

## Numerator

- Encounter with Non-Operating Room Opioid and Non-enteral Antagonist administered:
  - Outside of the operating room 12 hours or less following Opioid administration outside of the operating room

# 2026: CMS 832 / HH-AKI Hospital Harm Acute Kidney Injury

Voluntary Reporting for CMS IQR in 2026 - 2027  
(Required 2028)

## Hospital Harm – Acute Kidney Injury

# HH-AKI

Acute kidney injury affects up to 10% of hospitalized patients, comparable to the rates of severe sepsis and acute lung injury. Up to two thirds of intensive care patients will develop acute kidney injury. Acute kidney injury may result in the need for dialysis and is associated with an increased risk of mortality.

While not all instances of acute kidney injury are avoidable, a proportion of acute kidney injury cases are preventable and treatable.

HH-AKI measures the proportion of inpatient hospitalizations for patients 18 years and older who have an acute kidney injury (stage 2 or greater) that occurred during the encounter.

**Inverse Measure:** Yes

**Risk Adjusted:** Yes

**Required 2026:** No (Mandatory 2028)

# HH-AKI

## Initial Population/Denominator

- Inpatient Encounter
- $\geq 18$  years of age
- Length of Stay of 48hrs or more
- At least one serum creatinine value 48hrs or more after encounter start. *Index creatinine is the lowest within 24hrs of arrival (or first w/in 48hrs if none earlier)*
- No obstetrical or pregnancy-related conditions

## Numerator

- Two-times or greater increase in serum creatinine compared to the lowest prior value within 7 days **Or**
- Dialysis started more than 48hrs after arrival

## Exclusions

- Increase of  $> 0.299$  mg/dL in creatinine between the index creatinine and a subsequent value within 48hrs of encounter start
- Index eGFR  $< 60$  within the first 48hrs of encounter start (using the CKD-EPI race-neutral formula)
- Fewer than two creatinine results within the first 48hrs of encounter start
- Dialysis started  $\leq 48$ hrs after arrival without evidence of a two-times increase in creatinine
- Encounter with a high-risk diagnosis for AKI present on admission or clinically undetermined
- Encounter with high-risk procedures for AKI

*Encounters with missing or inaccurate sex or POA data may affect measure inclusion or exclusion*

# HH-AKI

**Risk Variables below are submitted in the QRDA file for adjustment by CMS.**

- Sex and Age
- First vital signs in Encounter (plus UOM)
  - Temperature
  - Heart Rate
  - Respiratory Rate
  - Systolic Blood Pressure
- Estimated glomerular filtration rate calculated using the index serum creatinine, patient sex, and age-based formula
- All encounter diagnoses with present on admission indicators (collected for development of baseline risk adjustment model). Targeted diagnoses at the time of development include:
  - Cancer (leukemia, lymphoma, or metastatic cancer)
  - Diabetes
  - Heart failure
  - Hypertension
  - Obesity
- Encounter length of stay

# 2026: CMS 826 / HH-PI Hospital Harm Pressure Injury

Voluntary Reporting for CMS IQR in 2026 - 2027  
(Required 2028)

## Hospital Harm – Pressure Injury

# HH-PI

Hospital-acquired pressure injuries are serious events and one of the most common patient harms. The incidence of pressure injuries in hospitalized patients has been estimated at 5.4 per 10,000 patient-days and the rate of hospital-acquired pressure injuries has been estimated at 8.4%. Over 50% of reported pressure injuries in hospitals were stage 2 or higher. Pressure injuries commonly cause local infection, osteomyelitis, anemia, and sepsis, in addition to causing significant depression, pain, and discomfort to patients.

The measure assesses the number of inpatient hospitalizations for patients aged 18 and older who suffer the harm of developing a new stage 2, stage 3, stage 4, deep tissue, or unstageable pressure injury.

**Inverse Measure:** Yes

**Risk Adjusted:** No

**Required 2026:** No (Mandatory 2028)

# CMS 826 / HH-PI

## Initial Population / Denominator

- Inpatient encounter
- Age  $\geq$  18 years

## Exclusions

- Deep Tissue Pressure Injury (DTPI) or stage 2, 3, 4 or unstageable pressure injury diagnosis present on admission
- DTPI found on exam within 72 hours after the start of the encounter
- Stage 2, 3, 4, or unstageable pressure injury found on exam within 24 hours after the start of the encounter

## Numerator

New deep tissue pressure injury (DTPI) or stage 2, 3, 4, or unstageable pressure injury, as evidenced by any of the following:

- A DTPI or stage 2, 3, 4, or unstageable pressure injury diagnosis not present on admission as indicated by a present on admission indicator of N or U.
- A DTPI found on exam greater than 72 hours after the start of the encounter.
- A stage 2, 3, 4 or unstageable pressure injury found on exam greater than 24 hours after the start of the encounter.

# HH-FI (CMS 1017) Hospital Harm – Falls with Injury

Voluntary Reporting for CMS IQR in 2026 – 2027  
(TEAM Model 2027) (Proposed Required 2028)

## Hospital Harm – Falls with Injury

# HH-FI

Inpatient falls are among the most common incidents reported in hospitals, can increase length of stay and costs, and are considered a Serious Reportable Event. Falls can result in injury ranging from minor abrasion or bruising to death. Major injuries have the biggest impact on patient outcomes, but data shows 41.8% of falls resulted in moderate injuries such as skin tear, avulsion, hematoma, significant bruising, dislocations and lacerations requiring suturing.

This measure assesses the number of inpatient hospitalizations where at least one fall with a major or moderate injury occurred among the total qualifying inpatient hospitalizations 18 years and older.

**Inverse Measure:** Yes

**Risk Adjusted:** Yes

**Required 2026:** No (Proposed Mandatory 2028)

# HH-FI

## Initial Population/Denominator

- Inpatient Encounter
- $\geq 18$  years of age
- $LOS \leq 120$  days

## Denominator/Numerator Exclusions

- Fall Diagnosis present on admission or clinically undetermined

## Numerator

- Inpatient Fall Event/Diagnosis during encounter with
  - Major injury (not present on admission, documentation insufficient to determine, POA indicator NULL)Or
  - Moderate injury (not present on admission, documentation insufficient to determine, POA indicator NULL)

## Measure Observations:

- Observation 1 = Total number of hospital days for all qualifying patients minus exclusions
- Observation 2 = Total number of numerator cases (number of patients with an inpatient fall with injury)

\*Reported as the number of inpatient hospitalizations with falls with moderate or major injury per 1000 patient days

# HH-FI

## Risk Variables

- Medications active on admission: - anticoagulants - antidepressants - antihypertensives - central nervous system depressant medications - diuretics - opioids
- Anticoagulant medications administered during the hospitalization
- Diagnoses present on admission which may increase the risk for a fall with injury: abnormal weight loss - malnutrition - coagulation disorders - delirium, dementia, or other psychosis - depression - epilepsy - leukemia or lymphoma - liver disease (moderate to severe) - malignant bone disease - neurologic movement and related disorders - obesity - osteoporosis - peripheral neuropathy - stroke - suicide attempt
- BMI
- All encounter diagnoses with rank (e.g., 1, 2, 3) and present on admission (POA) indicators

# **CMS 1218 / HH-RF**

## **Hospital Harm – Postoperative Respiratory Failure**

Voluntary Reporting for CMS IQR in 2026 - 2027  
(TEAM Model 2027) (Proposed Required 2028)

# HH-RF

PRF is defined as unplanned endotracheal reintubation, prolonged inability to wean from mechanical ventilation, or inadequate oxygenation and/or ventilation. PRF is the most common serious postoperative pulmonary complication, with an incidence of up to 7.5%. PRF can increase the risk of morbidity and mortality, with in-hospital mortality resulting from PRF estimated at 25% to 40%

This measure assesses the number of elective inpatient hospitalizations for patients aged 18 years and older without an obstetrical condition who have a procedure resulting in postoperative respiratory failure.

**Inverse Measure:** Yes

**Risk Adjusted:** Yes

**Required 2026:** No (Proposed Mandatory 2028)

# HH-RF

## Initial Population/Denominator

- Elective inpatient encounter (includes inpatient admissions from outpatient surgery – new encounter type that needs to be mapped like IN/OBS/ED)
- Encounter class elective qualifier value
- Without an ED visit
- $\geq 18$  years of age
- Surgical Anesthesia Procedure within 3 days of encounter start (uses first procedure if more than one)
- Without OB Condition

## Exclusions

- Degenerative Neurological Disorder
- High Risk to Airway Head Neck and Thoracic Surgery
- Mechanical Ventilation that Starts More than One Hour Prior to Start of First OR Procedure
- Neuromuscular Disorder
- PaCO<sub>2</sub> Greater Than 50 and Arterial pH Less Than 7.30 within 48 Hours Prior to Start of First OR Procedure
- PaO<sub>2</sub> Less Than 50 within 48 Hours Prior to Start of First OR Procedure
- Principal Diagnosis of Acute Respiratory Failure with Rank of 1
- Diagnosis of Acute Respiratory Failure Present on Admission
- Tracheostomy Present on Admission
- Tracheostomy Prior to or on the Same Day of First OR Procedure

# HH-RF

## Numerator

Intubation *outside of procedural area* **and** within 30 days after the end of the first OR procedure time (based on anesthesia end time)

or

MV that occurs *outside of procedural area* within 30 days after the end of the first OR procedure **and**

- is preceded by a period of non-invasive oxygen therapy between the end of the OR procedure and the MV occurrence **and**
- without a subsequent OR procedure between the non-invasive oxygen therapy and the MV occurrence

or

Extubation outside of a procedural area more than 48hrs after the end of OR procedure **and**

- is within 30 days after the end of the first OR procedure **and**
  - is not preceded by period of non-invasive oxygen therapy **or**
  - is not extubated during general anesthesia

or

MV between 48 and 72 hours after the end of an OR procedure **and**

- within 30 days after the end of the first OR procedure **and**
  - is not preceded by a non-invasive oxygen therapy **or**
  - a subsequent OR procedure between the end of the OR procedure and the MV occurrence

# HH-RF

## Risk Variables:

### First resulted vital sign values:

- Body temperature Cel, [degF]
- Heart rate {Beats}/min
- Respiratory rate {Breaths}/min
- Systolic blood pressure: mm[Hg]

### First resulted laboratory test values:

- Albumin g/dL, umol/L
- Aspartate aminotransferase (AST/SGOT) U/L, IU/L
- Bicarbonate mmol/L
- Bilirubin mg/dL, umol/L
- Blood urea nitrogen (BUN) mg/dL, umol/L
- Carbon dioxide (partial pressure) mm[Hg]
- Creatinine mg/dL, umol/L
- Hematocrit %
- Hemoglobin g/dL, mmol/L
- Leukocyte count {cells}/uL,  $10^3/uL$ ,  $10^9/L$ , /mm<sup>3</sup>
- Oxygen (partial pressure) mm[Hg]
- pH of arterial blood [pH]
- Platelet count  $10^3/uL$ ,  $10^9/L$ , /mm<sup>3</sup>
- Sodium meq/L, mmol/L
- White blood cell count {cells}/uL,  $10^3/uL$ ,  $10^9/L$ , /mm<sup>3</sup>

### Additional variables used for risk adjustment:

- American Society of Anesthesiologists (ASA) physical status class assessment
- First Body mass index (BMI), reported using UCUM unit: kg/m<sup>2</sup>
- All encounter diagnoses with their present on admission (POA) indicators + Rank
- All major surgical procedures
- Most recent smoking status

# **CMS1061 / HH-VTE**

## **Hospital Harm – Postoperative Venous Thromboembolism**

Voluntary Reporting for CMS IQR in 2028 – 2029  
(Proposed Required 2030)

# HH-VTE

Postoperative venous thromboembolism (VTE) includes deep vein thrombosis (DVT) and pulmonary embolism (PE) occurring after surgery. DVT is linked to poor clinical outcomes including post-thrombotic syndrome, anticoagulation-related bleeding, and death. During 2019, 2021, and 2022, patients in the United States experienced 51,586 perioperative VTEs, signaling ongoing opportunities to reduce postoperative VTE rates through evidence-based prevention strategies such as mechanical and pharmacologic prophylaxis.

This measure assesses the proportion of inpatient encounters for patients aged 18 years and older who have at least one surgical procedure performed inside the operating room during the encounter and who suffer the harm of a postoperative VTE during the encounter or within 30 days after the first surgical procedure.

**Inverse Measure:** Yes

**Risk Adjusted:** Yes

**Required 2026:** No (Proposed Available 2028, Mandatory 2030)

# HH-VTE

## Risk Variables:

The measure's initial risk model includes the following factors:

- Sex
- Age
  - Stratified into bands in the risk model: 18–29, 30–39, 40–49, 50–59, 60–69, 70–79, and 80+.
- Bleeding disorders
- Cancer
- Central venous catheter (CVC) insertion
- History of venous thromboembolism (VTE)
  - Defined as either a VTE risk assessment with a result of "high risk" during or before the encounter, OR a history of VTE as a diagnosis during or before the encounter.
- Obesity
- Respiratory operations
- Stroke
- Vascular surgery

**Additional factors captured for potential future model modification:**

- Diabetes
- Fractures
- Hip/knee replacement
- Hormone therapy use
- Immobility
- Tobacco use

# Getting Started (or Restarted!) with eCQMs

# Understanding Electronic Clinical Quality Measures

eCQM Process

## PREPARATION & PLANNING



### Education

Rule analysis, spec updates, value set & code changes



### Discovery

Requirements identification, gap analysis, impact assessment



### Build & Map

Technical architecture, data flows, update mapped codes, implementation strategy

## CORE eCQM PROCESS



### IMPLEMENT

CQL logic, data elements, codes



### CAPTURE

Structured data documented



### CALCULATE

Data extraction & calculation



### IMPROVE

Analyze results for opportunities

## SUPPORTING ACTIVITIES



### Validate

Verify measure populations and confirm data accuracy & completeness



### Optimize

Improve processes, address feedback, enhance performance



### Submission

Submit QRDA files to regulatory bodies

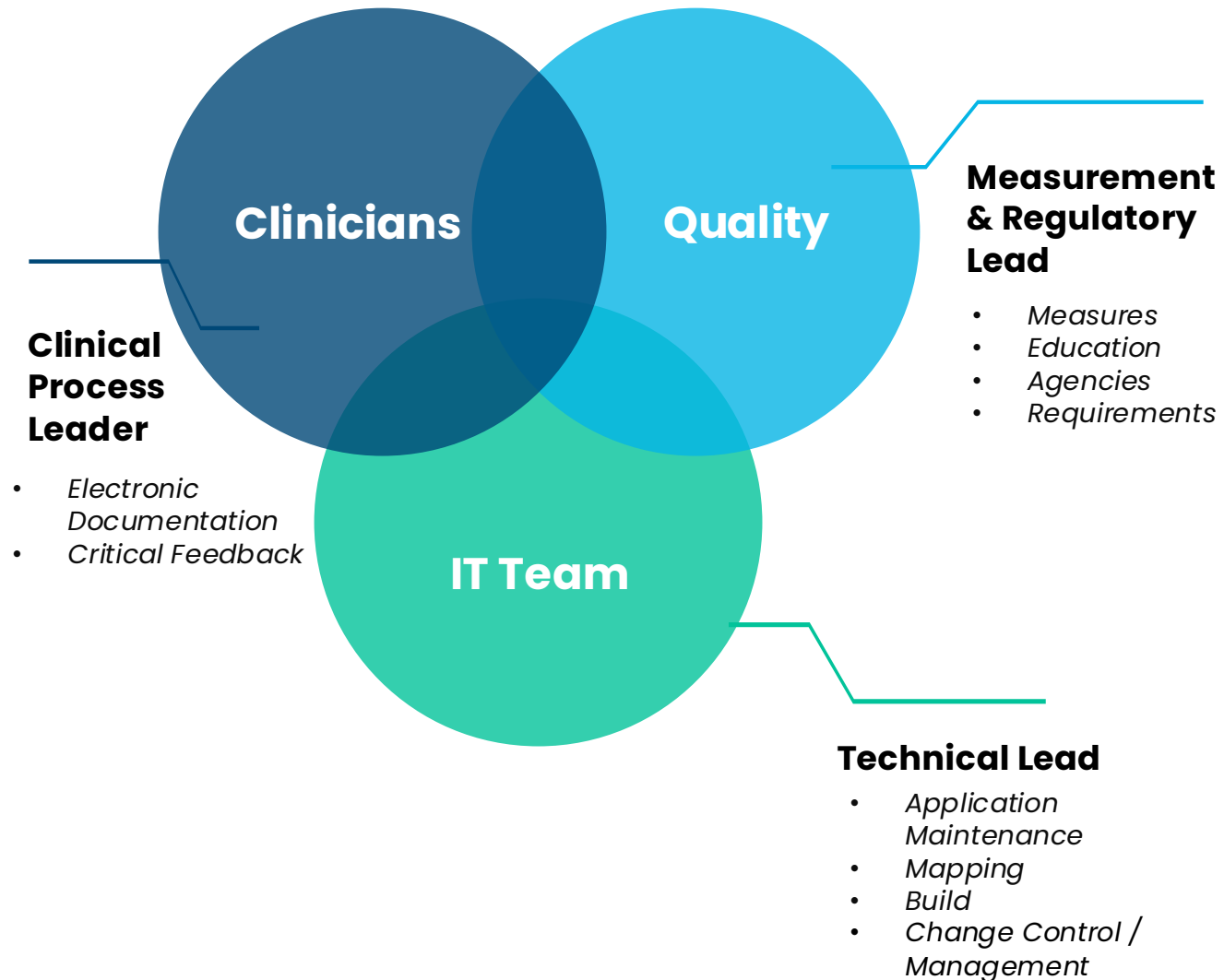
# eCQM Data Management

## Data Management is Key!

- Successful eCQM management requires a structured data management plan to ensure the accuracy and integrity of your data. Helps healthcare organizations maintain accurate and usable patient records and ensures that the information meets regulatory requirements.
  - Organizing and handling of data
  - Ensuring data is collected, stored, processed, and used effectively
  - Applying relevant codes
  - Safely storing it in a database
  - Ensuring it is in the correct format for various uses such as generating regulatory files like QRDA I
  - Keeping track of where the information came from within the EHR system to ensure accuracy and compliance.

# eCQM Management Plan

- eCQM management team: representatives from both the IT and Quality teams must be involved.
- Collaborate on data management processes
- Determine Ownership
- eCQM data capture, accuracy, completeness, mapping, storage, and QRDA file components.



# **eCQM Management Plan**

## **Education**

- Educate team members. Make sure all stakeholders understand the basics of eCQMs, the significance of failing an audit, and are committed to your data management goals.
- Identify and share resources

# eCQM Management Plan

## Start with a self-audit then track changes every year

Develop a system for tracking your eCQM data capture processes that can be used as a central resource for eCQM management and for audit prep.

- Identify the eCQMs being tracked and submitted by your hospital every year.
- Document each data element included in each measure.
- Review EHR documentation process for each data element:
  - ✓ Identify where in the EHR the data element is/could be documented
  - ✓ Who documents
  - ✓ Structured vs Unstructured vs Paper
  - ✓ EHR identifiers
  - ✓ Mapping

Population	Data Element	Data Capture Workflow	Code Type	EHR ID	Primary "Documenter"	Relevant Unit/Location	Comment
Denominator	Opioid or Benzodiazepine	Discharge Order	RXNORM				
	Inpatient Encounter	Admission/Registration	SNOMED	ENCOUNTER			
Exclusions	Cancer Related Pain	Coding Problem List	ICD SNOMED			ONC floor only?	1 ICD code in value set – build out documentation for this; don't think coding will capture
	Sickle Cell Disease	Coding Problem List	ICD SNOMED				
	Opioid Use Disorder Diagnosis	Coding Problem List	ICD SNOMED				
	Treatment for Opioid Use Disorder - Medication AND Treatment Intervention	Med Rec Orders Clinical Documentation	RXNORM SNOMED	This is new in 2025, do we document?			Both the medication and treatment intervention must be present with relevant codes to qualify as an exclusion
	Hospice or Palliative Care	Order	SNOMED	PCARE.ORD1	On consult order by clinician	n/a	Confirm we don't document this anywhere else; Palliative care notes?
	Acute Care Hospital, Hospice Care Referral or Admission, Expired, Left AMA	Discharge Status	SNOMED	DISCHARGE	Captured during dc process	n/a	Review mapping – code changes for AMA & Expired
Numerator	2 or more Opioids or Opioid & Benzodiazepine	Discharge Order	RXNORM				

# eCQM Readiness Playbook: CMS 506 Example

For Medisolv Quality Academy Members

Measure Overview | **Current State & Gap Analysis** | Codes | Validation

① Red items = New or changed for 2026

Export Excel | Full Screen | View Gap Report

DATA ELEMENT	DATA CAPTURE METHOD	BEST PRACTICE WORKFLOW	YOUR CURRENT WORKFLOW	WORKFLOW GAPS?	MAPPING GAPS?	GAP NOTES	ALL GAPS RESOLVED?
Discharge To Acute Care Facility <a href="#">Codes</a>	Click to select...	• Discharge Status	N/A	Yes No	Yes No	Describe any gaps...	Yes No
Hospice Care Referral or Admission <a href="#">Codes</a>	Click to select...	• Admission/Registration • Nursing Doc • Orders • Other Clinical Doc • Provider Doc	N/A	Yes No	Yes No	Describe any gaps...	Yes No
Left Against Medical Advice <a href="#">Codes</a>	Click to select...	• Discharge Status	N/A	Yes No	Yes No	Describe any gaps...	Yes No
Medications for Opioid Use Disorder (MOUD) <b>NEW</b> <a href="#">Codes</a>	Click to select... <input type="checkbox"/> Structured EHR Field <input type="checkbox"/> Paper <input type="checkbox"/> Free Text <input type="checkbox"/> Not Documenting	• eMAR	N/A	Yes No	Yes No	Describe any gaps...	Yes No

# Improving eCQM Results

# Understanding Fallouts



### eCQM Measure Results

Hospital:

01/01/2025 - 12/31/2025

Inpatient eCQMs  Outpatient eCQMs  Hybrid Measures  Future eCQMs

### Rate Measure Results

	?	CMS ID	TJC ID <sup>△</sup>	Measure Name	eCQM Version	Initial Population	Denominator	Exclusion	Numerator	Num. Exclusions	Exception	In Denominator Only	Result
		<input type="text"/>	<input type="text"/>	hospital harm	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
		CMS832v2	HH-AKI	Hospital Harm - Acute Kidney Injury	2024	566	566	256	5	N/A	0	305	1.61%
		CMS871v4	HH-Hyper	Hospital Harm - Severe Hyperglycemia	2024	479	479	36	99	7	0	344	192/1376 0.14
		CMS816v4	HH-Hypo	Hospital Harm - Severe Hypoglycemia	2024	164	164	0	2	N/A	0	162	1.22%
		CMS819v3	HH-ORAE	Hospital Harm - Opioid-Related Adverse Events	2024	579	579	0	2	N/A	0	577	0.35%
		CMS826v2	HH-PI	Hospital Harm - Pressure Injury	2024	1249	1249	82	10	N/A	0	1157	0.86%

### Rate Measure Results Details

Drag a column header here to group by that column

	Patient Name	Medisolv Identifier	Case Identifier	Result	Admit	Discharge	Age	Discharge Location	Discharge Disposition	Qualifying Encounter LOS	Measure Observation
				numerator							
	Roach, Raymond	667346a89913801884424b67	AC10000279975	In Numerator	2/24/2024 10:39:00 AM	2/27/2024 3:23:00 PM	79	Location 726	Discharge to acute care hospital (procedure)	3	2:1
	Travis, Simone	6673470a991380188450d578	AC10000251022	In Numerator	1/1/2024 3:25:00 PM	1/6/2024 10:00:00 PM	66	Location 726	Discharge to acute care hospital (procedure)	5	4:1
	Cipolla, Armine	6673475e99138018845faa69	AC10000274378	In Numerator	1/8/2024 3:19:00 PM	1/12/2024 12:00:00 PM	80	Location 726		4	2:2
	Hyman, Lorraine	667346ae9913801884440d92	AC10000256967	In Numerator	1/12/2024 11:47:00 PM	1/22/2024 4:05:00 PM	89	Location 726		10	8:1
	Mirsky, Stanley	6673478f991380188468401a	AC10000273487	In Numerator	12/29/2023 4:05:00 PM	1/4/2024 1:55:00 PM	62	Location 726		6	4:2

Codes	Description	Collection Time	Status	Documentation	Result	Unit	Used
	glucose						
Loinc:41653-7	Glucose [Mass/volume] in Capillary blood by Glucometer	1/28/2025 9:16:00 PM	performed	CDM.LabTestComponents, DataSource: laboratory_results, TOM107_CHILD_ORDER, TLB800_TEST_CODE_MST, Code:41653-7	346.0	mg/dL	
Loinc:41653-7	Glucose [Mass/volume] in Capillary blood by Glucometer	1/29/2025 8:55:00 PM	performed	CDM.LabTestComponents, DataSource: laboratory_results, TOM107_CHILD_ORDER, TLB800_TEST_CODE_MST, Code:41653-7	305.0	mg/dL	

Codes	Description	Status	Start Time
		admin	
RxNorm:855312	warfarin sodium 2.5 MG Oral Tablet	administered	1/30/2025 2:31:00 PM
RxNorm:835603	tramadol hydrochloride 50 MG Oral Tablet	administered	1/30/2025 11:19:00 PM
RxNorm:835603	tramadol hydrochloride 50 MG Oral Tablet	administered	1/31/2025 7:50:00 AM
RxNorm:855312	warfarin sodium 2.5 MG Oral Tablet	administered	1/31/2025 1:26:00 PM
RxNorm:835603	tramadol hydrochloride 50 MG Oral Tablet	administered	1/31/2025 4:03:00 PM

Value Set Quality Check

Hospital:

Total Patients : 2697

Version: 2024 (EH, EC)

Measure Selection: CMS506v7 - Safe Use of Opioids - Concurrent Prescribing

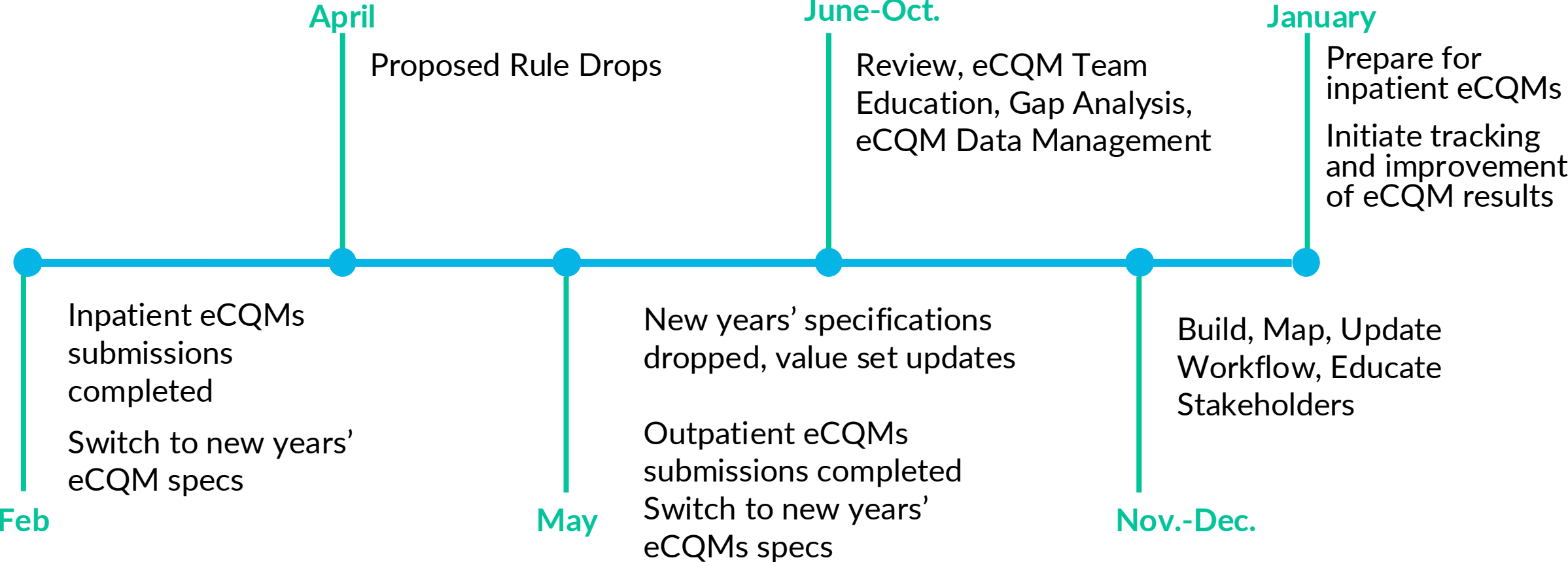


Drag a column header here to group by that column

Old	Description	Type	Codes in Value Set	Patients With Codes	% Patients With Code	△	CMS Ids
							CMS506v7
2.16.840.1.113762.1.4.1111.177	Opioid Medication Assisted Treatment (MAT)	Procedure		4	0	0%	CMS506v7
2.16.840.1.113762.1.4.1111.175	Sickle Cell Disease with and without Crisis	Diagnosis		37	49	1.82%	CMS506v7
2.16.840.1.113762.1.4.1111.180	Cancer Related Pain	Encounter Diagnoses		7	51	1.89%	CMS506v7
2.16.840.1.113762.1.4.1046.269	Medications for Opioid Use Disorder (MOUD)	Medication		30	80	2.97%	CMS506v7
2.16.840.1.113762.1.4.1111.180	Cancer Related Pain	Diagnosis		7	81	3%	CMS506v7
2.16.840.1.113883.3.600.1.1579	Palliative or Hospice Care	Procedure		10	105	3.89%	CMS506v7
2.16.840.1.113762.1.4.1116.365	Hospice Care Referral or Admission	Encounter Discharge Disposition		9	110	4.08%	CMS506v7
2.16.840.1.113762.1.4.1111.171	Opioid Use Disorder	Diagnosis		27	180	6.67%	CMS506v7
2.16.840.1.113883.3.117.1.7.1.308	Left Against Medical Advice	Encounter Discharge Disposition		1	190	7.04%	CMS506v7, CMS71v14
2.16.840.1.113762.1.4.1125.1	Schedule IV Benzodiazepines	Medication		94	1845	68.41%	CMS506v7

# Managing the Annual eCQM Cycle

# Annual eCQM Cycle



# eCQM Data Management Plan

## Frequency + Timelines

Agree on and commit to timelines for eCQM data review and frequency of review. How often will you meet as a team? How will you communicate gaps, status, dependencies? – it is imperative your review processes align with:

1. **Annual regulatory updates** - know when new measures are added, and when specifications and codes are updated
2. The eCQM reporting period start and end date
3. Submission window open & close
4. Specific submission plans and timing
5. Validation selection timing

# eCQM Management Plan

Be aware of and plan for other changes that might impact your eCQM data.

01

Documentation –  
new, updates,  
changes

02

Mapping &  
formulary vendor  
updates

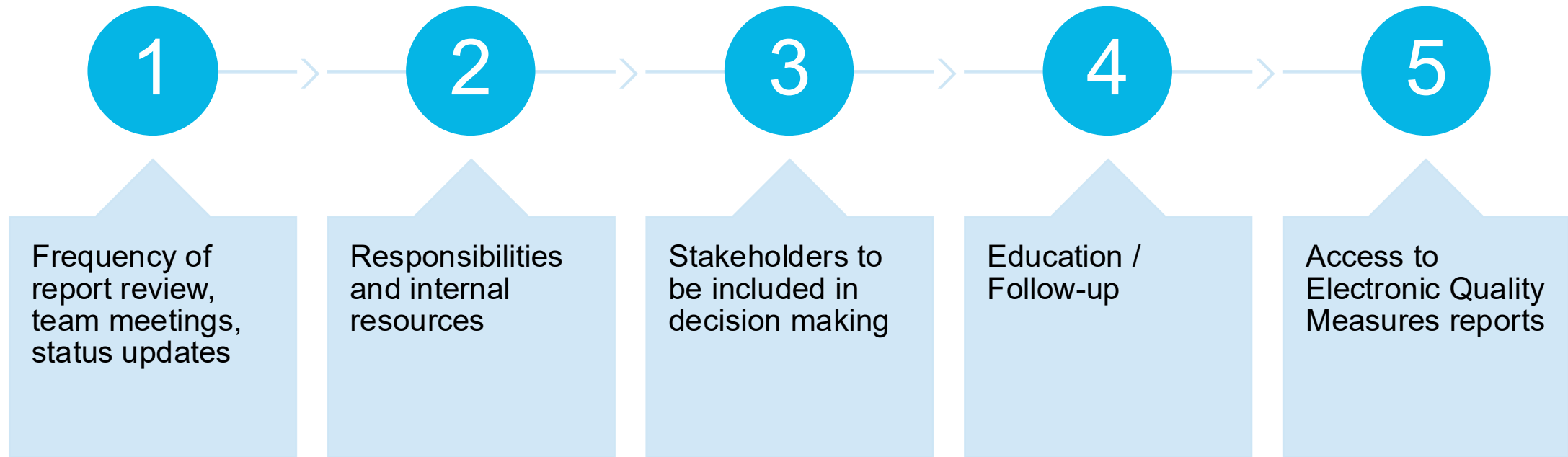
03

EHR and other  
vendor software  
updates +  
migrations



# Plan for Improvement

## NEED TO DETERMINE



# Safety Isn't Optional, It's the Future

- CMS is clearly signaling a shift: patient safety is the priority, and electronic measurement is the path forward.
- Hospital Harm eCQMs are not just new measures, they are foundational to future models like TEAM.
- Now is the time to act:
  - Validate your data
  - Strengthen your documentation
  - Engage your teams in improvement efforts
- Preparation today ensures performance tomorrow.

# Contact Us



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