

EDI Submitter Program Working Group Questions (as of June, 2023)

No.	Subject	Date	EDI	Focus	Question	Response from CMS/Program	Meeting Minutes/Documentation Reference
1	Peritonitis	06/26/2023	Nathan Muzos	N/A	We are seeking clarification (and publicly available documentation) regarding the new peritonitis reporting in EQRS.	N/A	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov)
2	Peritonitis	06/26/2023	Nathan Muzos	Program	What defines a qualifying peritonitis event to be reported? Is it just a positive culture or can there be a sterile event?	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
3	Peritonitis	06/26/2023	Nathan Muzos	Program	What timeframe should be expected to count symptoms/outcomes under one event, so we don't report duplicate data?	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
4	Peritonitis	06/26/2023	Nathan Muzos	Program	Element = wasPD Suspended; Field Type = Text; Listed Value = Yes, No, Unknown; Definition = Indicates whether PD was suspended Questions: 1) What is the definition of "Suspended"? 2) Does it mean patient switched to a different modality temporarily? Or that they shifted their PD treatment schedule for a couple days? 3) Is there a minimum timeframe for it to be considered "suspended"?	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
5	Peritonitis	06/26/2023	Nathan Muzos	Program	Element = pdFluidDrawnDate; Field Type = Text; Listed Value = YYYY-MM-DD; Definition = Indicates the date pd fluid was drawn Question: 1) If drawn multiple times, which fluid draw do we report for each event?	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
6	Peritonitis	06/26/2023	Nathan Muzos	Program	Element = wasAbdominalPain; Field Type = Text; Listed Value = Yes, No, Unknown; Definition = Indicates whether the patient had abdominal pain Question: 1) What is considered acceptable or is this attribute specific to abdominal pain only? - Nausea, Vomiting, Diarrhea, Fever and Chills, Low UF, Irritable	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
7	Peritonitis	06/26/2023	Nathan Muzos	Program	Element = wasEffluentCloudy; Field Type = Text; Listed Value = Yes, No, Unknown; Definition = Indicates whether the patient's effluent was cloudy Question: 1) Is this attribute specific to a response of 'Cloudy' only or are other response that would also indicate a "Yes"? -Fibrin, Pink/Red, Hazy	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/26/2023: The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
8	Infections	06/27/2023	Kathleen Prewitt	Program	We have reviewed the error codes provided for the infection module and have concerns about error code 31350: PD Fluid Cell Count cannot exceed 4000. We sometimes do have results where this number exceeds 4000, so making this a cap on a required field will result in the same as above – underreporting (inability to submit event) or inaccurate data (defaulting to 4000 just to get the data entered).	08/09/2023: CMS has a meeting scheduled for 08/10/2023 with the CDC to resolve open peritonitis questions. 07/14/2023: This is noted and under discussion. The peritonitis questions are currently under discussion.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording
9	Testing	06/27/2023	Kathleen Prewitt	Technical	Also from our last call (6/14), the minutes mentioned that pre-prod is not ready for testing because it didn't have the right code. Has this been corrected since the code is now live in production?	07/14/2023: Corrected and shared on last Program call. 06/28/2023: Per Adrienne the code has been updated and they can start working in the pre-prod environment.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording

10	System	06/27/2023	Kathleen Prewitt	Technical	I notice that the inability to enter the leading zero in the date field is still an issue in the live module. Will this be addressed soon? (I'd suggest also fixing this issue in the vaccination module. It's an inconvenience when 9 of 12 months start with a leading zero.)	08/09/23: EQRS team will discuss this on the next PDM/PO call. 07/14/2023: We will provide a short-term work-around while adding a long-term fix to the EQRS backlog. 06/28/2023: Per Adrienne the team has it on their backlog list but not sure when the fix will be in place. Kathleen suggested to also address the same issue in the Vaccination module as well.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov) 08.09.2023 Program Working Group Meeting Minutes and Recording																		
11	Peritonitis	06/28/2023	Kathleen Prewitt	Technical	I'd like to also add a request for additional documentation: When the data dictionary, XSD, and XML files are updated on Confluence, would it also be possible to provide sample feedback XML and XSD for peritonitis, as were provided for vaccination?	06/28/2023: Per Adrienne, a sample Feedback File has been posted on the public facing Communications Hub.	2023.06.28 EQRS Program Working Group Meeting - EQRS - QualityNet Confluence (cms.gov)																		
12	Peritonitis	06/14/2023	Kathleen Prewitt /Vlad Ladik	Program	Reviewed the Peritonitis Event Data Submission Requirements. The only serious concern we have is about "PD Effluent Cell Count" and "Percentage of Leukocytes That Were Neutrophils". These two are numeric parameters that are listed as required. In majority of cases, we do not have these two parameters documented. There are also cases when PD Fluid Cell Count is documented as "Few" or "Moderate" or "Rare". I would propose to: • Remove these two parameters from the dataset. • OR change them to optional, • OR require entering result or specifying that result is not available (similar to how it is done with lab results in CPM). Kathleen: I had requested optional reporting for the "Who performs PD treatment?" field. The current data dictionary posted June 2 to Confluence and the pre-prod UI currently have these fields as required or conditionally required.	07/14/2023: Fields requested to be optional are under discussion.	<table border="1"> <tr> <td>Was effluent drawn for a culture test?</td> <td> <ul style="list-style-type: none"> Yes No Unknown </td> <td>Required</td> </tr> <tr> <td colspan="3">If "Yes", effluent was drawn for culture test is selected:</td> </tr> <tr> <td>Date peritoneal fluid was drawn</td> <td> <ul style="list-style-type: none"> Exact date (DDMM/YYYY) </td> <td>Optional</td> </tr> <tr> <td>PD fluid cell count</td> <td> <ul style="list-style-type: none"> Numeric entry field: cells/microliter </td> <td>Required</td> </tr> <tr> <td>Percentage of leukocytes that were neutrophils</td> <td> <ul style="list-style-type: none"> Numeric entry field, cannot exceed 100 </td> <td>Required</td> </tr> <tr> <td>Was the culture test positive?</td> <td> <ul style="list-style-type: none"> Yes No Unknown </td> <td>Required</td> </tr> </table>	Was effluent drawn for a culture test?	<ul style="list-style-type: none"> Yes No Unknown 	Required	If "Yes", effluent was drawn for culture test is selected:			Date peritoneal fluid was drawn	<ul style="list-style-type: none"> Exact date (DDMM/YYYY) 	Optional	PD fluid cell count	<ul style="list-style-type: none"> Numeric entry field: cells/microliter 	Required	Percentage of leukocytes that were neutrophils	<ul style="list-style-type: none"> Numeric entry field, cannot exceed 100 	Required	Was the culture test positive?	<ul style="list-style-type: none"> Yes No Unknown 	Required
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13	Peritonitis	06/28/2023	Nathan Muzos	Program	I'd ask CMS to consider changing the verbiage of Monday's announcement from being 'required' to 'voluntary'. Until clear definitions are provided the data reported cannot be considered consistent across organizations and shouldn't be used for comparison. If that is the case, and considering the technical concerns raised (e.g. date fields), it seems like it is wasting clinicians time to manually enter this data to EQRS	07/26/2023: The language in the announcement of the Peritonitis go live was adjusted to remove it being "required" until further update from CMS. The updated announcement was released on 7/17/2023.																			
14	2728 Updates	06/28/2023	Nathan Muzos	Technical	Where does this stand and will you share the timing of its release to EQRS Production. - When will the updated technical documents be posted? - Will there be time for testing (UI and EDSM) in ProdPreview prior to its release to Production? 08/09/2023: There is confusion around using the posted 2728 form that is not final versus what's in EQRS. Can a communication with guidance be sent? EOCT can send communication as directed by CMS.	08/09/2023: The 2728 is still in PRA so the current form is not final OMB-approved version. Comments are still being received and there will be some minor updates. Guidance is to continue to use what's available in EQRS. 07/26/2023: Program expects the 2728 to clear PRA process sometime in September. Release to Production will follow after final updates are made based on PRA recommendations.	08.09.2023 Program Working Group Meeting Minutes and Recording																		

15	2728 Updates	06/28 /2023	Nathan Muzos	Program	<p>Is there a communications plan prior to this new version going live to prepare clinics /nephrologists/etc. of this pending change?</p> <p>- If so, can the EDIs be brought up to speed so we can be prepared to re-enforce and align our internal messaging with CMS?</p> <p>- If CMS can't stop the new version of the form from being posted online, what guidance will be given to cover the period between the new form being approved and EQRS having the new fields for completion?</p> <p>08/09/2023: Any information CMS can provide before the finalization is appreciated. EQRS users would like to see the communications plan; maybe a T-minus schedule. General announcements that a new form is coming. How should we handle the period between approval and the EQRS system update? The EDIs need to be in step with CMS; this is a large change and we need a plan.</p> <p>We also need a concerted testing plan. We'd like to manually test the new 2728 with this group.</p> <p>Is SSA also updating the new fields in their system? If not, there may be difficulties with submissions</p> <p>Are all SSA offices aware that the 2728 is being updated?</p> <p>CMS is confident that all interested parties should be aware of the changes.</p> <p>Note: 2728 is not a 1-1 with the SSA system. SSA has been on previous 2728 workgroups. The EQRS patient matching algorithm is not affected by the changes.</p> <p>Action Items</p> <ul style="list-style-type: none"> • 2728 Rollout Plan: add to SMT agenda • Time between approval and EQRS updates • Plan for Testing • Engage EOCT re inserting 2728 announcements in other communications prior to approval • Work to understand and mitigate the impact of 2728 changes to other agencies (SSA, etc.) 	<p>08/09/2023: CMS is unable to speak to changes until the 2728 form is finalized.</p> <p>Sending communications before that happens may lead to more questions.</p> <p>There is a robust communications plan planned once the changes are finalized.</p>	08.09.2023 Program Working Group Meeting Minutes and Recording
16	2728 Updates	06/28 /2023	Nathan Muzos	Program	<p>Is this the approved version of the form we should all be ready to transition to?</p> <p>- This version is dramatically different from the last version shared with EDIs. I would guess most organizations are not prepared to collect this data.</p>	<p>07/26/2023: Please see the response to question # 14.</p>	
17	2728 Updates	06/28 /2023	Nathan Muzos	Technical	<p>How will the new data fields be incorporated into the Patient Demographics XML, if at all?</p> <p>- This has the potential to break all of our submissions if not coordinated with enough time and information to make updates to our systems.</p> <p>- The EDIs previous recommendation (4/5 /23 meeting) was for any new fields on the 2728 to be optional for Patient Demographics file submission for this reason.</p> <p>08/09/2023: There is precedent for flagging EQRS optional fields as required for the 2728.</p>	<p>08/09/2023: Optional fields for the form versus optional fields for patient demographics are different.</p> <p>07/14/2023: Fields requested to be optional are under discussion.</p>	08.09.2023 Program Working Group Meeting Minutes and Recording
18	Reports	06/28 /2023	Nathan Muzos	Technical	<p>Can you share the status of this work? Timing of any new report releases, etc.</p> <p>- On the 4/5/23 meeting the goal was to release 2 reports per month but we haven't heard any progress or seen new reports being released.</p>	<p>07/26/2023: The first report (Clinical Dashboard) is targeted for completion by 08/29 /2023. Work on the second report (Vaccinations) is expected to begin pin P124 (08/30/2023 - 11/21 /2023).</p>	

19	Peritonitis	06/29 /2023	Howard Thomas	Program /Technical	<p>I have read the minutes and found the "guidelines" that were sent out to be useless for our purposes. Sending out a clinical treatment guideline is totally inappropriate for this group. We have real questions and need real answers to support the automation of this new reporting requirement. Probably not the feedback you wanted but whoever thinks that a huge clinical treatment document with literally hundreds of clinical references is going to help us simply punting on our questions. Unacceptable. Who is going to address our questions?</p> <p>Data dictionary for all fields. Business processing criteria - such as what triggers the need to report and the associated questions. Sample xml for all parts of this. Testing plan for EDIs. We have done this many times before, why is the process not being used now.</p>	07/26/2023: These statements and questions have been addressed in questions 1 through 18.	
20	Attestations	7/21 /2023	Kelsey Okland	Program /Technical	<p>Per the recent communication regarding the CY 2024 PPS Proposed Rule, CMS is proposing to add the Facility Commitment to Health Equity reporting measure to the ESRD QIP measure set beginning with PY 2026 which assesses an ESRD facility's commitment to health equity based on its responses to five equity related attestation-based questions.</p> <ul style="list-style-type: none"> o Can we expect these attestation questions to be reported in EQRS and to receive further communications regarding this? o If the attestation questions are reported in EQRS will these data points be made to be batched or manually entered? 	08/09/2023: No update yet.	08.09.2023 Program Working Group Meeting Minutes and Recording