

Regarding QCDR and qualified registry requirements for data submission, CMS also proposes QCDRs and qualified registries be required to obtain both the email addresses of eligible clinicians for the purpose of distributing performance feedback, as well as authorizations from each eligible clinician to release his or her email address.

*AAFP Response*

We presume that these ongoing monthly support conference calls will be highly beneficial for both QCDRs and qualified registries and that the majority of QCDR's will attend the calls more often than not. However, we do not endorse mandatory participation in these support calls, nor do we endorse mandatory in-person attendance at the QCDR kick-off meeting in Baltimore, MD, or the proposal that more than one unexcused absence could result in the QCDR or registry being precluded from participation in the program for that year. These proposals require unnecessary tracking efforts and create undue burden upon both QCDRs and qualified registries. The proposed data submission, validation, and ongoing auditing requirements are sufficient motivators to encourage QCDRs and qualified registries to utilize the support resources provided. In addition, absence from a mandated attendance conference call or meeting may have no bearing on the quality of the services the QCDR or qualified registry provides, yet could significantly harm the participating eligible clinicians should they no longer be able to use the QCDR or qualified registry simply due to lack of attendance at a meeting.

The AAFP strongly recommends that Direct addresses be utilized for trusted exchange of performance feedback information. Our recommendation is that it would be prudent to encourage use of the secure Direct exchange for this purpose between QCDRs, qualified registries, or any qualified third party, and its participating eligible clinicians.

a. QCDRs

(7) Collaboration of Entities to Become a QCDR:

The rule proposes to allow that an entity that uses an external organization for purposes of data collection, calculation, or transmission may meet the definition of a QCDR provided the entity has a signed, written agreement that specifically details the relationship and responsibilities of the entity with the external organization effective as of September 1 the year prior to the year for which the entity seeks to become a QCDR (for example, September 1, 2016, to be eligible to participate for purposes of the 2017 performance period).

*AAFP Response*

The AAFP recommends the deadline for this be November 1 rather than September 1. November 1 is the deadline for self-nominations for QCDR and qualified registry status and is also the deadline for submission of all other information required as a component of the third-party qualification application process. For simplification and standardization, we recommend November 1 be established as the deadline for the written agreement between an entity and an external organization that will perform data collection, calculation, or transmission in order to meet the definition of a QCDR.

c. Qualified Registries

(1) Establishment of an Entity Seeking to Qualify as a Registry

The rule proposes (at §414.1400(h)) that in order for an entity to become qualified for a given performance period as a qualified registry, the entity must be in existence as of January 1 of the performance period for which the entity seeks to become a qualified registry (for example, January 1, 2017, to be eligible to participate for purposes of performance periods beginning in