

Quality Improvement Strategy: Overview of Requirements for QHP Issuers in the Washington Health Benefit Exchange

Background

Under section 1311(g) of the Affordable Care Act, an eligible issuer participating in the Exchange for two or more consecutive years must implement a quality improvement strategy (QIS) and report to the Exchange on its progress regularly. A QIS must incentivize quality by tying payments to provider performance measures or measures related to incentivizing enrollees to make healthy choices or exhibit healthy behaviors.

Which Issuers Must Submit a QIS to the Exchange during 2016?

Issuers seeking WAHBE QHP certification for the 2017 plan year must submit a QIS to the Exchange if:

- The issuer offered a QHP through the Exchange in 2014 and 2015, and
- The issuer had more than 500 enrollees in a product type as of July 1, 2015

QHP issuers in the individual and SHOP markets, including issuers of Multi-State Plans, are subject to the QIS requirements. Child-only plans, stand-alone dental plans, and QHPs compatible with health savings accounts are **not** subject to the QIS requirements at this time.

QIS Requirements

- Issuers must develop a QIS, which is a payment structure providing increased reimbursement or other market-based incentives for improving health outcomes of plan enrollees
- The QIS must be implemented as of 1/1/17
- The QIS must include activities that address at least one of the following:
 - Improving health outcomes
 - Preventing hospital readmissions
 - Improving patient safety and reducing medical errors
 - Wellness and health promotion
 - Reducing health and health care disparities
- The QIS may be directed toward the needs of an entire QHP population or to the needs of a subpopulation (e.g., improving health outcomes within a QHP's population of diabetic enrollees)
- Issuers must use data to identify and describe the health outcome needs and priorities included in their QIS, and their methodology must be included in their QIS submission
- An issuer may submit one QIS (or more) to address all eligible QHPs offered in the Exchange
- Issuers must comply with federal QIS requirements released by HHS, including the QIS Technical Guidance and User Guide for the 2017 Coverage Year, located at:
<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Downloads/QIS-Technical-Guidance-and-User-Guide.pdf>

2017 QIS Submission Timeline

QIS Submission Timeline		
Activity	Responsible Entity	Timeframe
Issuers develop QIS for the 2017 coverage year	Issuer	January – May 2016
First draft of QIS submission due to WAHBE	Issuer	6/1/2016
WAHBE provides corrections to first draft of QIS to issuers	WAHBE	7/1/2016
Second draft of QIS submission (including summary) due to WAHBE	Issuer	8/1/2016
WAHBE approves final QIS submissions to be presented to Board	WAHBE	9/1/2016
Deadline for QIS approval through Board certification of QHPs	WAHBE	9/8/2016

How does an issuer submit a QIS to WAHBE?

An issuer's QIS submission must include the following two documents and be approved by WAHBE to be considered complete and to meet certification criterion 2.2.10 of the Guidance for Participation in the Washington Health Benefit Exchange:

- A detailed description of each QIS applicable to any QHP to be offered in the Exchange for 2017, using the following form: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/Downloads/QIS-Implementation-Plan-and-Progress-Report-Form.pdf> (First draft due 6/1/2016)
- A one- to two-page summary of their QIS that will be viewable on the Exchange corporate website (Due 8/1/2016)

The two documents required for issuers' 2017 QIS submissions must be provided in both Word and PDF formats and must include the issuer's logo. WAHBE will provide a template for issuers to use to complete the QIS summary.

Evaluation of QIS Submissions

An issuer's QIS will be evaluated each year as part of the annual certification process. For the first year of evaluation (in 2017 during the annual certification process for the 2018 plan year), WAHBE will review and evaluate an issuer's QIS using performance measures and data collected via the Implementation Plan and Progress Report form. More information about the QIS evaluation process to be followed by WAHBE in future years will be announced in a separate communication.