

Eli's Hospice Insider

Compliance: Weigh Quality Reporting Deactivation Carefully

Beware what you cannot take with you when you switch users.

You should have one quality measure reporting phase down and one to go, and you may be thinking about switching users to report that data. Think again, CMS advises.

In the Hospice Quality Reporting Program, you must deactivate a user account to change to a different user. "We do realize there are circumstances where it may become necessary to replace one registered user with another," stated **Robin Dowell**, a nurse consultant for the **Centers for Medicare & Medicaid Services'** Center for Clinical Standards and Quality, in a recent special Open Door Forum. "Therefore, the first user account must be deactivated in this circumstance. For these instances, there is a user deactivation process in place."

"This deactivation policy or process is for those circumstances where providers cannot control the fact that the first user must be deactivated," Dowell explains. "However, we strongly encourage providers to try to plan for the best scenario to get them through both submission reporting periods with one user account."

Why? If you deactivate your user account, the new user must reenter and resubmit all the data.

Switch Users After Deadline & Lose It All?

If you deactivate a user account before the submission deadline (Jan. 31 for Structural Measure and April 1 for Pain Measure), the new user can resubmit the data that the original user entered. But if you deactivate the account after the deadlines, "there is no ability to reenter or resubmit that data," Dowell warned.

CMS will give consideration to hospices that must request deactivation, due to circumstances beyond their control, Dowell stated. But none of the forum panelists described specifically what that "consideration" might be.

Good news: Although the data created from the deactivated account won't be viewable for you, whatever data you submitted is still viewable and retained by CMS, explained panelist **Lori Grocholski** with the CMS Division of National Systems.

Likewise, if you need to switch users at the end of the reporting period □ assigning a new user account for the next reporting period □ you won't lose any data as long as you already submitted it, Dowell said. By then, your entry would have already counted towards your Annual Payment Update.

When You Absolutely Must Deactivate

If you have no choice but to deactivate your user account to set up a new one, there is a deactivation process in place. First, you must obtain and complete a User Deactivation Request Form on your provider letterhead. You can obtain and submit the form via the QTSO Helpdesk.