



# Digital Quality Measure (dQM) Reporting Readiness Guide



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## **Introduction**

Welcome to the dQM Reporting Readiness Guide. This document is designed to support organizations interested in completing comparative testing by providing a comprehensive collection of materials, guidelines, and frequently asked questions. You are encouraged to use any or all the sections and tools included here as you see fit, whether you choose to engage fully in comparative testing or simply need reference materials to inform your decision-making process. The flexibility of this guide ensures that you can tailor its use to best meet your organization's needs and readiness.

## Overview

NCQA has adopted an **optional comparative testing approach** for dQMs, replacing mandatory parallel testing.

This approach reflects NCQA's commitment to partnering with organizations and responding to the differing organizational needs that emerge in the industry transition to digital measurement. Optional comparative testing balances flexibility with accountability by shifting readiness ownership to organizations while maintaining existing audit controls for reported results.

### Key Principles

- **Optional, not mandatory:** Comparative testing is available but not required.
- **Organization-owned readiness:** Organizations assess and manage their own risk.
- **Continuity in HEDIS® Data Quality:** dQM submissions through the Interactive Data Submission System (IDSS) for reporting follow the same audit rules as traditional HEDIS.

Topic	New Approach
Testing requirement	Optional
Timing	Flexible (not required to be concurrent)
Auditor involvement	Recommended, not required
Responsibility for variance analysis	Organization
Use of dQM for HEDIS Reporting	All requirements for traditional reporting would apply (e.g., timeline, HEDIS audit, HOQ and IDSS use)

### Recommended (Not Required)

NCQA recommends comparative testing, including auditor engagement, as a best practice, particularly for organizations new to dQMs or making significant system or process changes.

## Timelines

This shift to making comparative testing optional does not signal a change to NCQA's digital transition timelines. Organizations are still expected to progress toward full digital reporting by the established milestones.

While comparative testing is no longer required, NCQA strongly encourages organizations to begin their transition early rather than waiting until the transition to fully digital reporting. A stepwise approach, starting with a small set of measures or populations and gradually scaling over time, has emerged as a best practice. Organizations that adopt this approach are better positioned to identify data gaps, understand differences in results, and build operational confidence well in advance of full digital adoption.

## Measure Guidance

NCQA is not prescriptive regarding the number of measures or product lines an organization includes in its comparative testing approach. Instead, organizations have the flexibility to determine the scope based on their needs, resources, and strategic priorities. However, to help you get started, we suggest considering a diverse selection of measures that reflect common industry practices and leverage a range of FHIR™ resources. Selecting measures that utilize different FHIR resources can help ensure your testing process addresses a breadth of workflows. Some suggested measures are:

- Breast Cancer Screening (BCS-E)
- Colorectal Cancer Screening (COL-E)
- Plan All-Cause Readmissions (PCR)
- Glycemic Status Assessment for Patients With Diabetes (GSD)
- Blood Pressure Control for Patients With Diabetes (BPD)
- Well-Child Visits in the First 30 Months of Life (W30)
- Chlamydia Screening (CHL)
- Appropriate Testing for Pharyngitis (CWP)
- Follow-Up After Hospitalization for Mental Illness (FUH)
- Use of Opioids at High Dosage (HDO)
- Initiation and Engagement of Substance Use Disorder Treatment (IET)
- Depression Remission or Response for Adolescents and Adults (DRR-E)
- Prenatal Immunization Status (PRS-E)

## Approaching FHIR for Comparative Testing

Appropriate and accurate FHIR data is essential for comparative testing. Organizations may either map their existing data models to FHIR or use data natively mapped to FHIR.

For digital HEDIS, NCQA advises using these materials, aligning with the appropriate measurement year version, during implementation:

- **HEDIS Core Implementation Guide** – Outlines essential FHIR structures for all digital HEDIS measures. Organizations should closely review coded values within FHIR resources, meta tags, and extensions.

**Note:** Digital HEDIS measures are based on mandated standards like US Core and CARIN Blue Button. Ignoring additional HEDIS Core IG data elements may lead to unexpected outcomes.

- **Resource Companion Guide** – Provides detailed, measure-specific guidance covering required FHIR resources, value sets, medication lists, extensions, and direct codes essential for measure calculation.
- **CQL Logic** – Covers calculation scenarios, data evaluation, and expectations for measure logic execution.

## Auditor Involvement

Organizations have the option to engage their auditor for comparative testing. Involvement is recommended as it can promote proactive awareness of an organization's operational approaches for dQMs, establish an opportunity for an independent third-party evaluation and potentially facilitate a smoother transition to dQM use for HEDIS reporting.

If an organization chooses to engage their auditor for comparative testing, activities might include:

- Information sharing on what vendor(s) the organization is working with, the scope of comparative testing (e.g. product lines, measures, timing) and initial approaches the organization is using to prepare their data for dQM use.
- Rate comparisons between an organization's digital and traditional HEDIS results and providing input on the comparability of the results produced by each methodology.
- Discrepancy evaluations focused on specific data management activities or targeted data sources based on findings from rate comparisons.

The digital results produced during comparative testing will not undergo a full end-to-end audit, will not receive audit designations, and auditors will not issue a Final Audit Report for these digital outcomes. Comparative testing workflows may differ across organizations, and audit engagement for this process may be outside the scope of existing contracts for traditional HEDIS audit services. Organizations interested in engaging their auditor can communicate with them directly to identify the appropriate engagement structure, timing, and team to meet their specific reporting needs and resources. Auditors will serve as independent evaluators and will not provide technical assistance or advisory services to the organizations that they audit.

It is important to note that organizations can proceed with comparative testing without auditor participation. However, should the organization officially transition to dQM reporting for HEDIS through the IDSS in the future, the same HEDIS Compliance Audit requirements for traditional reporting will apply. The HEDIS Compliance Audit methodology and timeline remain unchanged for traditional reporting; auditors continue to validate the rates reported in the traditional manner.

## Resources

NCQA is actively developing tools that can be optionally used by organizations working with an auditor for comparative testing. Similar to the HEDIS Roadmap, these tools are designed to facilitate information sharing between organizations and their vendors and guide discussions around potential operational workflows for dQM production. Organizations will soon be able to request access to these resources directly from their audit firm.

## IDSS Comparative Version

Comparative testing can be completed using a cloned version of IDSS. This cloned version is strictly for testing purposes and gives organizations a platform to validate their files with NCQA data collection elements, tools, and processes. It is important to note that the cloned IDSS is not used for official reporting; rather, it provides a secure environment for organizations to ensure their data aligns with NCQA requirements before submission. Like the IDSS, organizations using the cloned system determine what individuals have access to the results.

To request access to the cloned version of IDSS, submit your request through [My NCQA](#) by following the instructions in [How to get support](#) and selecting “**Data Collection**” as the Program/Product type.

**Note:** The cloned IDSS site may be briefly unavailable around late February or early March each year for updates to the current measurement year.

### Once you have cloned IDSS access:

#### Log in at:

IDSS Comparative Site - <https://idssdqm.qa.ncqa.org>

#### Resource Files for Download:

<https://www.ncqa.org/hedis/data-submission/idss-redesign/>

These are helpful resources for organizations when converting digital measures to XML format.

- Submission Files: XML files for uploading to IDSS by product line
- Schemas: Required XML structure and format
- Data Dictionary: List of all measures and data elements in the XML file

#### Important Notes for IDSS Testing:

- The IDSS site has the same organization and submission details as the production version.
- Error and warning validations match those in the production environment.

NCQA is not prescriptive regarding how your organization uses the cloned IDSS for testing, allowing you the flexibility to establish workflows that best fit your needs. Once your testing process is complete, NCQA is happy to support and review your results if you wish, ensuring you have access to guidance and feedback as needed.

# Frequently Asked Questions

## General

### What is comparative testing?

Comparative testing is an optional process where organizations compare digital measure results to traditional methods or prior results to assess consistency, reliability, and readiness for reporting.

### Why did NCQA change the name?

The term “parallel testing” may have been interpreted to mean that digital measures must be run on the same timeline as traditional reporting. NCQA would like to clarify that organizations are not required to execute digital measures concurrently with their traditional submissions.

### Is comparative testing required?

No. Comparative testing is optional and not required for dQM reporting.

### Why did NCQA change comparative testing to optional?

NCQA has collaborated with early implementers to gain insights into comparative testing processes during implementation. Additionally, NCQA has delivered iterative releases and tools informed by these experiences. This shift offers organizations enhanced flexibility as they adopt digital measures, preserves the quality of HEDIS reporting, and eliminates duplicative work and requirements.

### What if our organization chooses not to conduct comparative testing?

Organizations may still submit dQMs for HEDIS reporting if they are confident in their results. Organizations assume the associated risk of not conducting comparative testing. The same requirements for traditional HEDIS would apply to dQM submissions for HEDIS reporting.

### Has NCQA defined an acceptable margin of variation when comparing traditional and digital measure results?

No. NCQA does not require that traditional and digital results be exactly aligned or be within a pre-determined margin of variation. Differences are expected due to data infrastructure variability. The focus of comparative testing should be on reviewing results, enabling comparisons and supporting rationale to assess validity, which may differ across organizations.

### What is the typical duration for comparative testing, and how many full-time equivalents should be assigned to support it?

The duration and staffing needs for comparative testing depend on several organizational factors, including but not limited to:

- Availability of tools and capabilities to accurately map FHIR data to digital measure requirements.

- The team's ability to interpret digital measure specifications and FHIR implementation guides, including understanding CQL and resolving conformance errors.
- The tools and process in place to identify issues, trace root causes, and iterate quickly within data pipelines.
- The ability to efficiently validate results between digital and traditional HEDIS measures.

### **How will NCQA support organizations that are pursuing comparative testing?**

Support for comparative testing will vary depending on customer needs. NCQA cannot assist with data mapping, CQL interpretation or validation of results. However, NCQA provides guidance on digital measure specifications, implementation guides and other supporting materials and system-related (i.e., IDSS) questions for comparative testing submissions.

Support can be requested through [My NCQA](#).

## **Audit**

### **Do we need to involve an auditor for comparative testing?**

Auditor involvement is recommended as a best practice but is not required for comparative testing.

### **What are the audit implications of comparative testing?**

There are no prescriptive requirements if an organization chooses to involve an auditor in their comparative testing. Organizations should not anticipate a separate end-to-end audit that results in audit designations for digital results or a Final Audit Report. Instead, auditors can be involved as independent third-party evaluators to compare testing results between digital and traditional methodologies (e.g., rates, initial populations, exclusions and numerators). They may also investigate data mapping and production processes contributing to discrepancies. Organizations may also share information with their auditor on any plans and approaches to digital measurement. Auditors will not provide organizations that they audit with technical assistance or advisory services.

### **Are dQMs for HEDIS reporting still audited?**

Yes. dQM results submitted through IDSS for HEDIS reporting are subject to required HEDIS audit controls, just like traditional measures.

## **Data Submission and Reporting**

### **Will NCQA migrate to FHIR-based submissions instead of the IDSS XML format?**

NCQA is monitoring and evaluating progressions in the standard for reporting submissions. If your organization has feedback on this format, please submit a PCS ticket to [My NCQA](#).

### **Do the NCQA digital quality measures generate results in the IDSS XML format?**

No. NCQA digital measure output is in FHIR .json format at the member level. It is the responsibility of the organization or its vendor to convert these results into the IDSS XML format required for submission.

**How do I submit digital results to IDSS for reporting (not comparative testing)?**

The process remains the same, except NCQA now requires an identifier to show that the submission or specific measures were calculated using digital logic rather than traditional methods.

**Will digital results be incorporated into NCQA benchmarks?**

NCQA will monitor and assess the impact of dQM reporting on benchmarks and as needed, provide additional guidance or refine our benchmark strategy.

## How to get support

If you have questions, need assistance, or want to share feedback, our team is ready to help you.

We recommend [My NCQA](#) for the fastest response to your questions, concerns and comments. The system also lets you track your questions and answers. We aim to respond to all inquiries within **48 hours** during business days.

- Click on “**My Questions**” in the menu.
- Select “**Ask a Question.**”
- From the options provided, choose “**PCS.**”
- In the **Program/Product Type** section, pick **the choice that best fits the topic of your inquiry:**
  - For **Comparative Testing**, select “**Digital Content Services.**”
  - For the **HEDIS Audit**, select “**HEDIS Audit.**”
  - For **HEDIS Volume 2 Interpretation**, select “**HEDIS.**”
  - For **Data Collection (IDSS)**, select “**Data Collection.**”
  - For **dQM Implementation Validation**, select “**dQM Implementation Validation.**”