
FEHB Program Carrier Letter

All FEHB Carriers

U.S. Office of Personnel Management
Healthcare and Insurance

Letter No. 2020-14

Date: October 6, 2020

Fee-for-Service [11]

Experience-rated HMO [11]

Community-rated [12]

Subject: Update on Plan Performance Assessment Scoring Due To COVID-19 Pandemic

This Carrier Letter outlines OPM's FEHB Plan Performance Assessment (PPA) response to the national emergency caused by the COVID-19 pandemic. Under Federal regulation ([48 CFR 1615.404-70](#)¹), OPM is required to tie the profit factor for each FEHB contract to performance factors. Within the PPA framework, OPM has thus far defined these performance factors as specific Healthcare Effectiveness Data and Information Set (HEDIS) and Consumer Assessment of Healthcare Providers & Systems (CAHPS) commercial measures.

The National Committee for Quality Assurance (NCQA) [announced on April 3](#)² that they will require HEDIS and CAHPS measurement data to be reported for accredited commercial and Medicaid plans, but will not score the data reported in 2020 for purposes of calculating health plan ratings. On [March 13, NCQA posted guidance](#)³ related to reporting HEDIS hybrid measures, allowing plans to report the better of their audited 2019 or 2020 HEDIS hybrid rates. NCQA has also issued [guidance on CAHPS surveys](#), including that CAHPS will not be included in Quality Compass for 2020, and thus CAHPS benchmarks will not be available⁴.

On [June 22, NCQA updated their NCQA Quality Compass 2020](#) (Measurement Year 2019) guidance.⁵ In this update, NCQA announced the following regarding Quality Compass Benchmarks:

- Administrative HEDIS Measures – Will be reported as usual
- Hybrid HEDIS Measures – Will be reported for individual plan performance, as well as for national, benchmarks (averages and percentiles). Due to the large number of plans choosing to use their previous year's audited data, the tool will contain appropriate contextual flags cautioning the use of data for improvement scoring and year-over-year trending

¹ https://www.ecfr.gov/cgi-bin/text-idx?SID=78f6c0a5d7d7b48026841a4e02f53397&mc=true&node=pt48.6.1615&rgn=div5#se48.6.1615_1404_670

² <https://www.ncqa.org/covid/>

³ <https://www.ncqa.org/hedis/measures/hedis-and-covid-19/>

⁴ This information is in the table found by expanding the "Data Reporting and Uses, by Product Line" link and scrolling down to Quality Compass 2020.

⁵ This information is found by expanding the "NCQA Quality Compass 2020 (Measurement Year (2019) Update.

- CAHPS Measures – Will not be reported for individual plan performance. Benchmarks will be issued; however, they recommend against using the data for scoring and year-over-year trending

We remind Carriers that as stated in the [2020 FEHB Plan Performance Assessment Procedure Manual](#)⁶ in Section 1, Subsection C, “all FEHB Carriers must follow NCQA’s procedures for HEDIS reporting, including the HEDIS Compliance Audit.” This requirement remains in effect for the HEDIS and CAHPS Commercial measures being reported to NCQA now for use in the FEHB PPA. Therefore, OPM is announcing how we will determine the 2020 Clinical Quality, Customer Service, and Resource Use (QCR) score during this nationwide pandemic to allow FEHB Carriers to receive a PPA score.

- All FEHB Carriers required to report for the 2020 scoring cycle (per the 2020 FEHB PPA Procedure Manual) must report HEDIS and CAHPS measurement data in accordance with NCQA guidelines.
- PPA QCR Scoring for 2020 will be performed as follows, in accordance with NCQA guidance:
 - The PPA QCR score will be calculated based on the 2020 QCR Measure Set
 - HEDIS Administrative Measures
 - Will use the results reported in 2020 (2019 measurement year) and the 2020 NCQA Quality Compass benchmarks
 - HEDIS Hybrid Measures
 - Cervical Cancer Screening (CCS) and Prenatal and Postpartum Care (PPC) will use the results reported in 2019 (2018 measurement year) and the 2019 NCQA Quality Compass benchmarks
 - ◆ In February of 2020, NCQA issued their annual Measure Trending Determinations memo. This memo outlined measure specification changes between 2019 and 2020 and corresponding designations about how the measure years can be compared given the changes. Two QCR HEDIS Hybrid Measures appear on this list, Prenatal and Postpartum Care (PPC) and Cervical Cancer Screening (CCS). PPC was given a break in trend designation and CCS a trend with caution. Given that the 2020 Hybrid measure benchmarks will include a mix of 2019 and 2020 data, OPM determined not to use these benchmarks for scoring for measures with designations of trend with caution or a break in trend.
 - Controlling High Blood Pressure (CBP), Comprehensive Diabetes Care – HbA1c Control (<8) (CDC), Colorectal Cancer Screening (COL), and Well-Child Visits First 15-Months of Life (6 visits) (W15) will use the results reported in 2020 (2019 measurement year) and the 2020 NCQA Quality Compass benchmarks.
 - CAHPS Measures
 - Will use the results reported in 2019 (2018 measurement year) and the 2019 NCQA Quality Compass benchmarks
 - Improvement Increment

⁶ <https://www.opm.gov/healthcare-insurance/healthcare/carriers/2019/2019-12a1.pdf>

- Improvement Increment scoring is dependent on NCQA being able to calculate reliable standard deviations, OPM confirming standard deviation reliability, and use of 2020 reported results (2019 measurement year)
- HEDIS Administrative Measures
 - ◆ All eligible if reliable Standard Deviations are available
- HEDIS Hybrid Measures
 - ◆ Cervical Cancer Screening (CCS) and Prenatal and Postpartum Care (PPC)
 - Not eligible
 - ◆ Controlling High Blood Pressure (CBP), Comprehensive Diabetes Care – HbA1c Control (<8) (CDC), Colorectal Cancer Screening (COL), and Well-Child Visits First 15-Months of Life (6 visits) (W15)
 - All eligible if reliable Standard Deviations are available
- CAHPS Measures
 - ◆ Not eligible
- FEHB Carrier contracts that did not report in 2019 (i.e., first year contracts) will receive an Overall Performance Score based solely on their Contract Oversight Score.

It is possible that when OPM evaluates the 2020 Quality Compass benchmarks we determine that some or all of them will not be used for scoring. If this determination is made, OPM will use 2019 reported data and the 2019 NCQA Quality Compass benchmarks for those measures. In addition, if NCQA issues new guidance that impacts the 2020 scoring, OPM will use 2019 reported results (2018 measurement year) and 2019 NCQA Quality Compass Benchmarks where necessary. If 2019 reported results are used, this will be indicated on the QCR Preview and corresponding reports.

Amendments to the 2020 FEHB Contract will be forthcoming to incorporate this change.

At this time, the long-term impact of the COVID-19 pandemic is unknown. OPM is assessing events and may take further PPA action if warranted.

Carriers are reminded that updates related to Coronavirus and NCQA can be found on the [NCQA website](#)⁷.

Please send comments and questions regarding this guidance to FEHBPerformance@opm.gov and copy your Health Insurance Specialist and Contracting Officer.

Sincerely,

Laurie E. Bodenheimer
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⁷ <https://www.ncqa.org/covid/>