

# CROWN Memorandum



Memo Number: 09-0456-GN

TO: ESRD Executive Directors, ESRD Data Managers, Regional Project Officers

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SUBJECT: Implementation of CROWNWeb Phase II

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In preparation for the implementation of CROWNWeb Phase II, this memo provides readers with the preparation and implementation details. The first section of the memo addresses the general activities and responsibilities that CMS tasked to the ESRD Networks (NWs). These will occur during the Phase II implementation. The second section of the memo provides specific details and due dates for the preparation phase. The last section of the memo offers CMS responses to questions regarding the phased-in implementation approach.

## **Network Responsibilities During Phase II Implementation:**

- Verify that data is processed in SIMS and CROWNWeb in the same fashion. LDO facilities will enter the 2728 and 2746 data using the CROWNWeb single user interface (SUI) web form. The non-LDO facilities will enter all CROWNWeb administrative and clinical data via the SUI.
- Extract necessary information from CROWNWeb and enter the 2728, 2746 and events data into SIMS for the non-LDO facilities.
- Provide to CMS, on a weekly basis, feedback on the completeness, accuracy, and timeliness of the data.
- Participate in weekly conference calls with CMS and other contractors to discuss status of project.
- Encourage Phase II facilities to participate in the above mentioned weekly calls.
- Identify issues and respond by utilizing the CROWN Help Desk resource.
- Reinforce CROWNWeb training regarding appropriate entry of the necessary elements into CROWNWeb.
- Generate all available CROWNWeb reports and audit data.
- Review clinical data for face validity.
- Develop, implement, and evaluate internal Network processes for the validation of the timeliness, accuracy and validity of the CROWNWeb data submitted by the dialysis facilities.
- Evaluate the level of effort required by the Network to enter the CROWNWeb data into SIMS as we run parallel systems until full national implementation of CROWNWeb.

- Evaluate the effectiveness of the CROWN Help Desk relative to the requirements of this special project.
- Report weekly to CMS on each facility's performance. The report must include progress or lack of progress of their selected facilities in developing expertise with and the ability to independently use CROWNWeb. This weekly report must also include the number of Network hours needed to reinforce the CROWNWeb training, the number of Network hours needed to assist with data entry, and issues related to CROWNWeb reports, data, and connectivity. Specific content of the report may be altered as the project progresses and CMS will provide advance notice of any required changes to the report(s).

**Responsibilities During Phase II Preparation:**

**CROWNWeb Phase 2 Rollout Timeline**

Step	Start Date	End Date	Activity	Resource
1	June 17	June 23	CMS will issue a CROWN Memo to the 18 ESRD Networks with the plans and benefits of the CROWNWeb Phase 2 rollout and request for the information in step 2	CMS QIG and ISG
2	June 17	July 2	Each Network should identify the following: 1. Network Name/Number, Users from each NW (name, email, QIPS ID) 2. The following information from each selected Phase 2 facility: a. <u>5 Independent/SDO facilities</u> : Facility Name/CCN, Users from each facility (name, email, QIPS ID or new user); <i>encourage Phase 1 facilities to re-enlist</i> b. <u>5 LDO facilities</u> : Facility Name/CCN/LDO Affiliation, Users from each facility (name, email, QIPS ID or new user); <i>encourage Phase 1 facilities to re-enlist</i> c. Status of Delegation of Authority Form (CMS-10268) for each of the 5 LDO facilities; form contacts are as follows: FMC -- Norma.Oftshsun@fmc-na.com DCI -- Vlad.Ladik@dciinc.org DaVita -- Beverly.Tiller@davita.com, Bob.Lehn@davita.com	All 18 ESRD Networks
3	June 17	July 2	Networks should submit their full Phase 2 user list (including all NW users) identified in step 2 to CMS (Project Officer with cc to Jacqueline.Abt@cms.hhs.gov and Victoria.Schlining@cms.hhs.gov)	All 18 ESRD Networks
4	July 2	July 3	CMS will forward the final Phase 2 user list to the CROWN Help Desk in preparation for the establishment of new accounts, new delegation of authority mappings, and access to CROWNWeb roles and scope functionality	CMS ISG
5	July 2	July 9	All local SA's at the facility and Network level should complete the following: 1. create any new Phase 2 QIPS accounts 2. ensure CROWNWeb roles and scope are established for all Phase 2 users for both newly created users and current users 3. all LDO facility SA's should ensure they have submitted a Delegation of Authority Form (CMS-10268) to their corporate office	Network and Facility Security Administrators (SA)
6	July 2	July 10	Local SA's should complete mailing all QIPS account forms for new Phase 2 users (plus any change forms for current users) to the CROWN Help Desk	Network and Facility SA's
7	June 22	July 10	Each of the 3 LDO corporate contacts should: 1. complete the mailing of their batched Delegation of Authority Forms (CMS-10268) to the CROWN Help Desk 2. ensure all corporate CROWNWeb users have valid QIPS accounts and CROWNWeb batch submitter roles 3. ensure their VPN accounts are still active for the batch process 4. provide a complete list of all current and new users requiring VPN access to CMS (Stephen.Tulloss@cms.hhs.gov)	LDO's

8	July 2	July 10	CMS will send BCSSI a list of all current and new users with the CROWNWeb “batch” role who require VPN access	CMS ISG
9	July 10	July 10	Phase 2 facilities will upload their last VISION files via QNet Exchange (VISION facilities not in Phase 2 should continue to use VISION)	Phase 2 VISION Facilities
10	July 10	July 16	Networks download all VISION files from QNet Exchange and import into SIMS (July 11-12 is a scheduled maintenance weekend and systems will be unavailable)	All 18 ESRD Networks
11	July 2	July 17	The CROWN Help Desk will verify current active accounts and activate all new Phase 2 accounts for which proper paperwork has been received at the Help Desk	CROWN Help Desk
12	July 2	July 17	<b>Phase I ends</b> -- by midnight, all SIMS users should complete all data entry and as many data cleanup activities as possible; only data entered into SIMS prior to July 18 will be reflected in the Phase 2 CROWNWeb database available to users on August 3	SIMS users
13	July 18	Aug. 2	During system downtime, the following will occur: 1. SIMS <u>will be available</u> for all users during this time 2. Both QIPS and CROWNWeb <u>will not be available</u> for users during this time 3. CSC will replicate all 18 SIMS local databases to the SIMS Central Repository for the last time in preparation for Phase 2 data conversion (snapshot of SIMS) 4. After this replication, CSC will begin the data conversion of SIMS to CROWNWeb; only data entered into SIMS by the Networks (or imported into SIMS from VISION facilities) prior to July 18 will be reflected in the Phase 2 CROWNWeb database; all data entered into CROWNWeb during Phase I will be overwritten by the Phase 2 data conversion of SIMS to CROWNWeb 5. CROWN Help Desk will continue to process QIPS Account Forms and activate accounts for all users per system availability 6. After data conversion, CSC will remove the “last-login-value” trigger subsequently allowing Phase 2 users to log into CROWNWeb	CSC and the CROWN Help Desk
14	Aug. 3	2 weeks before national rollout	CROWNWeb Release 1.1.3 will officially come online for Phase 2 users	Phase 2 users
15	June 23	2 weeks before national rollout	Two ongoing SIMS data cleanup issues have been identified: 1. Patients with an unknown gender in SIMS need to have a gender of <u>Male</u> or <u>Female</u> prior to the National Release of CROWNWeb later this year; at last review of SIMS, 88 patients (72 living patients) had an <u>Unknown</u> gender. NW Data Managers should verify that no patients have an <u>Unknown</u> gender. 2. There are events in the SIMS Central Repository (CR) that no longer exist in each network's local repository. Leaving these events in the CR will cause incorrect admit/discharge information in CROWNWeb. A list of events to be deleted will be sent in mid-August to appropriate NW Data Managers for review prior to deletion from the CR; NW responses are requested by mid-September.	Network Data Managers

## **Questions and Answers:**

### **Why did CMS decide to implement CROWNWeb in phases rather than at one time?**

To ensure that CROWNWeb is a success as it moves from the testing to the implementation environment, CMS is committed to providing a system that maintains the quality, performance, and security standards necessary to collect and report meaningful clinical and administrative data for ESRD patients. CMS continues to believe that the February 2009 implementation date must

be maintained in order to develop the mature, comprehensive data sets that will be used to support critical initiatives such as the development of an ESRD value-based purchasing framework, the expansion of public reporting on the Dialysis Facility Compare website, and the quality improvement efforts of the ESRD Network Organization Program as well as the CMS Survey and Certification Program.

However, we also realize that we need to learn more about how the CROWNWeb system affects the cost and staffing burdens of dialysis facilities, and how we can work together with the renal industry to reduce those burdens.

### **When will Phase II of systems implementation occur?**

The next phase of implementation will begin in July 2009 with online direct data entry starting in early August. The success of Phase I helped to drive the implementation of Phase II: we believe that the software is ready for deployment; however, we want to learn more about the way facilities use the system, as well as the impact the system has on facilities.

### **Since Phase II will only include a limited number of facilities, what will the rest of America's 4,500+ Medicare-certified facilities do in the meantime?**

Facilities not participating in the second phase of the CROWNWeb implementation will continue with current business operations and reporting requirements as usual. This will include all SIMS, VISION, and paper-based data submissions. More information is available from the dialysis facilities' local Networks.

### **What is CROWNWeb?**

CROWNWeb is a secure, web-based system that will capture clinical and administrative data from dialysis facilities across the country, supplanting the paper-based data collection methods that CMS currently uses.

CROWNWeb is CMS' first step in leveraging the benefits of health information technology for the dialysis population, and will help us improve the quality of data we receive about dialysis treatments; help providers focus on providing optimal patient care; drive innovations and quality improvement of care practices; and equip CMS with more data in order to develop a more refined and responsive ESRD bundled payment system and ESRD value-based purchasing framework.

### **Why is CROWNWeb necessary? What value will it add for dialysis patients, providers, and payers?**

The chief benefit of the CROWNWeb system is the unprecedented access to volumes of clinical and administrative data about the dialysis population, which will provide a more complete source for measuring the quality of ESRD care at all Medicare-certified facilities. We have several plans for that data, including:

- **Expanding transparency/public reporting initiatives.** CMS intends to use the data from CROWNWeb to enhance the information available to consumers about dialysis services on our Dialysis Facility Compare website. We also hope to expand the reporting available to individual dialysis facilities so that they can learn more about their performance and how they can improve it.

- **Enhancing survey compliance activities.** CMS plans to use CROWNWeb data to rank ESRD facilities by state. This ranking will help state survey agencies prioritize the facilities that receive a survey. CMS will also produce data reports that state survey agencies can use to focus surveys on particular areas of concern, such as anemia management and infection control practices.
- **Informing efforts to improve the quality of dialysis care through the ESRD Network Organization Program.** ESRD Network contractors work nationwide to monitor the quality of ESRD care, partner with dialysis providers to improve the quality of care, help patients and their providers, address patient grievances, and collaborate and lead within the kidney care community. To use the resources of these vital Networks in the most efficient and effective way, CMS must have an exhaustive understanding of the state of dialysis care in every dialysis facility in the nation. The collection and analysis of CROWNWeb data will help the Agency do that.

### **What are the requirements for CROWNWeb participation under the conditions for coverage?**

Section 494.180(h) of the ESRD conditions for coverage (CfCs), effective February 1, 2009, requires that all dialysis facilities furnish data and information at intervals and in the format specified by the Secretary. The data is to include, but is not limited to, cost reports, administrative forms, patient-survival data, ESRD Clinical Performance Measures (CPMs) data, and any future requirements developed in accordance with a voluntary consensus standards process identified by the Secretary.

Facilities that are not part of Phase I/Phase II CROWNWeb implementation may continue to comply with the ESRD CfCs by following the current, paper-based reporting mechanisms implemented by CMS and the ENO contractors.

### **I've heard CROWNWeb referred to as a "pilot" program as of February 1, 2009. Is that true?**

No. CROWNWeb was released to a small, select number of Medicare-certified dialysis facilities as of February 1, 2009, not as a "pilot program," but in its production mode and as an integral part of each Phase I facility's Medicare-compliant operations.

The "batch" submission method under CROWNWeb will continue to be in a pilot phase as of August 2009 to those facilities that we select for Phase II that are part of one of the three large dialysis organization (LDO) chains: DaVita, Fresenius, and DCI. Batch submission of data will allow facilities that have clinical Information Technology (IT) systems to submit *some* (not all) data directly to CROWNWeb via regular submission intervals from the facility chains' corporate IT mechanism in "batches," rather than by manually entering the data into the SUI web forms, as required the non-batch CROWNWeb users.

Batch submission of data will continue to be in a pilot phase because we will be unable to implement it throughout the dialysis facility population at this time since the "batch" submission process is an unprecedented and complicated IT enterprise. Because batch submission is still in a pilot phase, we have advised all batch submitters that they must be prepared to provide the required data through the standard CROWNWeb SUI web forms if the batch submission method proves unsuccessful and is discontinued by CMS.

## **Why isn't batch processing available to all facilities as of August 2009?**

The batch submission process is an unprecedented and complicated IT enterprise. Care must be taken to ensure the batch process implements the necessary protections to secure and maintain the integrity of the information in transit. As such, the batch submission method—even in its “pilot” form—required thousands of work-hours to implement, and will require more resources as each new facility is added to the batch submission model. The eventual success of batch submission will benefit all dialysis providers; however, it will also require that CMS and its contractor staff learn:

1. **CMS-2744 - ESRD Facility Survey.** An annual census of the population served in each dialysis facility.
2. **CMS-2746 - ESRD Death Notification Form** (or computerized facility-generated Death Notification Form). CMS collects death data from the dialysis facility within 30 days of a patient's death. We use this data to calculate the survival data we publish on the Dialysis Facility Compare website.
3. **CMS-820 - In-Center Hemodialysis (HD) Clinical Performance Measures Data Collection Form and CMS-821 - Peritoneal Dialysis (PD) Clinical Performance Measures Data Collection Form.** Facilities complete these forms annually to help CMS collect important clinical quality measure information. Currently, CMS collects data from approximately 5% of dialysis patients nationwide through this method.

## **Manual input of data will make the data more error prone. What steps is CMS taking to assure the validity of the data?**

As data is entered into CROWNWeb, either through the standard web-based data entry method or through batch submission, edit checks are applied to ensure that the data fields conform to the data definitions and edits identified in the CMS's Kidney Data Dictionary (KDD). Any data that does not meet the requirements of this data dictionary cannot be saved in CROWNWeb, thus ensuring that all CROWNWeb data meets the data dictionary definitions.

## **How will our facility know whether our data has been accepted into the CROWNWeb system?**

CROWNWeb provides “Manage Clinical Data” screens that show the values that have been submitted or entered into CROWNWeb for each patient. Missing values are highlighted. Every CMS-certified dialysis facility should review these screens and supply any missing data.

## **What resources are available to facilities in preparing for the CROWNWeb transition?**

CMS and its designated contractors have worked hard to prepare dialysis facilities for the CROWNWeb transition. First, our contractors have mailed all facilities twice in the past months to inform them of the need to begin planning for CROWNWeb transition. These mailings included suggested preparations for successful program implementation. Second, CMS has held national calls and published newsletters each month for over a year. These calls and newsletters have been available to any stakeholder who would like to learn more about CROWNWeb. We have taken inquiries from these vehicles at [craft@nw7.esrd.net](mailto:craft@nw7.esrd.net). Participants are encouraged to visit <http://www.projectcrownweb.org/phasetwoenhancements.html> so they can learn what functions are being added for the Phase II software release. We will continue to be responsive to the dialysis facility community through the new CROWN Help Desk. Individual facilities can contact the CROWN Help Desk for more information at 1-888-ESRD-HD1 or [ESRDHD1@esrd.net](mailto:ESRDHD1@esrd.net).