Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) Frequently Asked Questions (FAQs)



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Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) Overview

1. What is a Quality Reporting Program?

The Centers for Medicare & Medicaid Services (CMS) implements quality initiatives to ensure quality health care for Medicare beneficiaries through accountability and public disclosure. Quality measures are tools that measure or quantify health care processes, outcomes, patient perceptions, and organizational structure and/or systems that are associated with the ability to provide high-quality health care and/or that relate to one or more quality goals for health care.

In the <u>Fiscal Year (FY) 2016 SNF Prospective Payment System (PPS) Final Rule</u>, CMS finalized the SNF QRP compliance requirements. Any SNF that does not meet reporting requirements may be subject to a two-percentage-point (2%) reduction in its Annual Rate Update (i.e., the Annual Payment Update [APU]).

The SNF QRP is described on the SNF QRP website.

2. What are the current measures in the SNF QRP?

Currently there are 15 quality measures in the SNF QRP.

These measures can be found on the <u>SNF Quality Reporting Measures and Technical Information</u> webpage.

For detailed quality measure specifications, please refer to the SNF Measure Calculations and Reporting User's Manual V3.0 and V3.0.1 Addendum, which can be found in the Downloads section on the SNF Quality Reporting Measures and Technical Information webpage.

3. What are the FY 2022 updates to the SNF QRP?

The FY 2022 SNF PPS Final Rule adopted two new quality measures into the SNF QRP: the SNF Healthcare-Associated Infections Requiring Hospitalization Measure (SNF HAI) and the COVID-19 Vaccination Coverage among Healthcare Personnel (HCP) measure. In addition, the denominator of one measure, the Transfer of Health (TOH) Information to the Patient-Post-Acute Care (PAC) measure, was updated to exclude residents discharged home under the care of an organized home health service or hospice.

Staying Informed About the Skilled Nursing Facility (SNF) Quality Reporting Program (QRP)

4. What is the process for adding and removing measures from the SNF QRP?

The Centers for Medicare & Medicaid Services (CMS) uses its annual public rule-making cycles to add new measures, modify existing measures, or remove measures from the QRP. This provides an opportunity for stakeholders to comment on proposed changes. The Final Rule (FR) publishes CMS's responses to all the comments received, as well as its decisions.

Proposed and final rules are posted on both of these webpages:

- The Federal Register
- The Skilled Nursing Facility (SNF) Prospective Payment System (PPS) Regulations and Notices

5. Are there other resources on the SNF QRP website I can use to stay up to date?

Several resources are available to help you stay informed about the SNF QRP:

- SNF QRP and SNF Prospective Payment System (PPS) websites:
 - o SNF QRP webpage
 - o SNF QRP Spotlights and Announcements webpage
 - o SNF PPS website
- Mailing list notices and announcements about the SNF QRP:
 - To receive notices and announcements, sign up at the <u>CMS Subscriber Preferences</u> webpage
- Notices about CMS Open Door Forums (ODFs) and other webinars related to the SNF QRP are posted on the following webpages:
 - o SNF QRP Spotlights and Announcements webpage
 - o CMS Special Open Door Forums webpage
 - SNF/Long-Term Care ODF webpage

6. Where can I find SNF QRP training materials?

Information about the SNF QRP, including Special ODF Presentations, provider training materials, and other resources, is available on the SNF QRP Training webpage.

For videos of past provider training sessions and webinars, please refer to the <u>CMS YouTube</u> <u>channel</u>. Click the link and search for "SNF."

Video recordings of the <u>August 2019 in-person SNF QRP Provider Training</u> presentations are available on the CMS YouTube channel.

Additional web-based training modules and presentations include:

- Introduction to the SNF QRP
- Section GG Cross-Setting Training
- Improving Medicare Post-Acute Care Transformation (IMPACT) Act and Assessment Data Element Standardization and Interoperability

Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) Technical Requirements

7. How are data collected and submitted for the SNF QRP?

The Minimum Data Set (MDS) is the assessment instrument SNF providers use to collect patient assessment data for quality measure calculation in accordance with the SNF QRP. Completion of the MDS is required for all residents in a Medicare-certified nursing home and residents in a Prospective Payment System (PPS) stay in non-critical access hospitals with Medicare swing bed agreements. Data for the QRP are collected on admission, on discharge (planned and unplanned), and for expired patients. The MDS is available to view in the Downloads section of the MDS Resident Assessment Instrument (RAI) Manual webpage. The MDS RAI Manual can be found on the same webpage and provides ongoing guidance to providers in completing the MDS.

Data for the SNF QRP measures are collected using three methods:

- MDS
- Centers for Disease Control and Prevention (CDC) National Healthcare Safety Network (NHSN)
- Medicare Fee-for-Service Claims

8. Which items on the SNF MDS are considered for compliance determination?

The SNF QRP Table for Reporting Assessment-Based Measures for the FY 2024 SNF QRP Annual Rate Update (i.e., Annual Payment Update [APU]) indicates the SNF MDS data elements that are used in determining the APU minimum submission threshold for the FY 2024 SNF QRP determination. It is available for download on the SNF Quality Reporting Measures and Technical Information webpage.

All MDS data elements should be accurately coded to reflect the patient's status and be submitted to the Centers for Medicare & Medicaid Services (CMS). It is the SNF's responsibility to ensure the completeness of the MDS data. By signing the MDS upon completion (item Z0400A), SNF staff are certifying that the information entered is complete to the best of their knowledge and accurately reflects the patient's status.

Data submitted for risk adjustment items are used to adjust the quality measure outcome scores based on patient characteristics. If data that are used for risk adjustment are not captured, a patient's complexity cannot be accounted for in the quality measure outcome scores. This means the risk-adjusted quality measure outcome scores reported on your Quality Measure Reports and on the Care Compare website may not reflect your SNF's unique patient complexities. It may result in lower performance rates, i.e., poorer scores.

For detailed measure specifications, please refer to the SNF QRP Measure Calculations and Reporting User's Manual V3.0 and the SNF QRP Measure Calculations and Reporting User's Manual V3.0.1 Addendum, which can be found in the Downloads section the SNF Quality Reporting Measures and Technical Information webpage.

9. What information is used for compliance determination of the NHSN measure?

To meet SNF QRP compliance, SNFs are required to submit COVID-19 vaccination data for eligible healthcare personnel (HCP) one week out of every month, but SNFs have the option of which week to report.

The COVID-19 vaccination among HCP measure is stewarded by the CDC's NHSN. The CDC makes reports accessible to SNFs that allow for real-time review of data submission. These reports reflect the data that will be sent by the CDC to CMS on behalf of each SNF. The CDC publishes reference guides for SNFs that explain how to run and interpret reports. These can be found on the NHSN website.

10. What are the requirements for the SNF to be considered compliant?

The CMS SNF QRP requires that SNFs submit quality measure data to CMS. SNFs must meet or exceed two data completeness thresholds:

- One threshold, set at 80 percent, for completion of quality measures data collected using the MDS and submitted through the CMS Quality Improvement and Evaluation System (QIES) Assessment Submission and Processing (ASAP) system.
- A second threshold, set at 100 percent, for quality measures data collected and submitted using the CDC NHSN.

Failure to submit the required quality data may result in a two-percentage-point (2%) reduction in the SNF's annual rate update (i.e., APU).

11. What are the data submission deadlines for the SNF QRP?

MDS and NHSN data are submitted to CMS based on deadlines established for the APU determination year. If corrections to the Quality Measure data need to be made, they must be submitted before the SNF QRP submission deadlines.

Data submission deadlines for the SNF QRP quality measures can be found in the Downloads section the SNF QRP Data Submission Deadlines webpage.

12. Does the definition of "quarter" for the quarterly MDS data submission deadlines include patients admitted during that quarter, discharged during that quarter, or both?

The quarterly data submission deadlines apply to patients with an admission and/or discharge date that occurs within that quarter. For example, if a patient was admitted on March 30 (Quarter 1: January 1–March 31) and discharged on April 28 (Quarter 2: April 1–June 30), there would be two submission deadlines to meet. The first quarter data submission deadline (August 15) would apply for the patient's MDS five-day PPS assessment and the second quarter data submission deadline (November 15) would apply for the patient's MDS PPS discharge record.

13. What is QIES? How can I request access to QIES?

Providers and vendors use the MDS 3.0 ASAP system to transfer MDS data to the National Submissions Database.

To receive access to the National Submissions Database, a user must have:

- A CMSNet user ID
- Communications software correctly installed on the user's PC

To register for a CMSNet user ID, select the <u>CMSNet Online Registration</u> link on the QIES Technical Support website and complete the registration process. If you encounter difficulties, contact the CMS Remote User Support Help Desk at (888) 238-2122.

For assistance with onboarding, users can call the QIES Technical Support Office (QTSO) Helpdesk at (800) 339-9313 or e-mail <u>iqies@cms.hhs.gov</u>. If you have any other questions related to QIES, please send them to <u>iqies@cms.hhs.gov</u>.

The Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) and the Minimum Data Set (MDS)

14. What is the current version of the MDS?

Version 1.17.2 of the MDS is to be completed for any patient discharged on or after October 1, 2021.

The Centers for Medicare & Medicaid Services (CMS) delayed the release of updated versions of the MDS to provide maximum flexibilities for SNF providers to respond to the COVID-19 public health emergency (PHE). The release of updated versions of the MDS will be delayed until October 1 of the year that is at least two full fiscal years after the end of the COVID-19 PHE.

The current version of the MDS is available in the Downloads section of the MDS 3.0 Technical Information webpage.

15. Where can I find the MDS 3.0 Resident Assessment Instrument (RAI) Manual for the SNF QRP?

Instructions for coding items in the MDS can be found in the MDS 3.0 RAI Manual. The current version of the MDS 3.0 RAI Manual is available in the Downloads section of the MDS RAI Manual webpage.

16. Who can complete a SNF MDS?

Each facility self-determines its policies and procedures for patient documentation practices and completing the assessments in compliance with state and federal requirements. A registered nurse (RN) assessment coordinator must sign and date the MDS item Z0500 completion attestation.

Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) Reconsiderations, Exceptions, and Extensions

17. Does the Centers for Medicare & Medicaid Services (CMS) tell SNFs if they are non-compliant with the QRP requirements?

Yes. Any SNF found non-compliant with the QRP receives a letter of notification from its Medicare Administrative Contractor (MAC). The notification letters is also placed into the SNF's Certification and Survey Provider Enhanced Reports (CASPER) folders in the Quality Improvement and Evaluation System (QIES) for the facility to access. The notification letter also includes the reason(s) for failing annual rate update (i.e., Annual Payment Update [APU]) compliance.

18. I received a letter of notification that my SNF is non-compliant with the SNF QRP requirements. Can I ask CMS to reconsider the decision?

The notification letter sent by the MAC includes instructions for requesting reconsideration of this decision. If a SNF believes the finding of non-compliance is in error, or it has evidence that an extraordinary circumstance prevented timely submission of data, the SNF may file for a reconsideration. An example of extraordinary circumstances might include a fire in the building. The request for reconsideration must be submitted to CMS within 30 days from the date at the top of the non-compliance notification letter. CMS will not accept any requests submitted after the 30-day deadline.

Requests for reconsiderations must be submitted via email. More information about how to submit a request for reconsideration can be found on the SNF QRP Reconsideration and Exception & Extension webpage.

19. The county where our SNF is located was affected by a natural disaster. Are we excepted from the QRP reporting requirements?

If a SNF is unable to submit quality data due to an extraordinary circumstance beyond its control, the SNF can request an exception or extension from the QRP requirements. The extraordinary circumstances may be natural or man-made. A SNF must request the exception or extension within 90 days of the event, and CMS may grant the exception or extension for one or more quarters. In the event of large-scale acts of nature, CMS may grant an exception or extension to an entire region without SNFs having to request one.

Requests for exceptions and extensions must be submitted by email. More information about how to submit a request for exception or extension can be found on the SNF QRP Reconsideration and Exception & Extension webpage.

Other Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) Frequently Asked Questions

20. Does my SNF need to report health care—acquired infection data under the SNF ORP?

There are currently no SNF QRP requirements for reporting health care—acquired infections. Please check with your state about any state-specific requirements related to submission of quality data, including health care—acquired infection data.

21. My facility's demographic data are incorrect on Care Compare. How do I correct them?

The demographic data displayed on the Provider Preview Reports and on Care Compare are generated from information historically stored in the Automated Survey Processing Environment (ASPEN) system. CMS will be transitioning to use the demographic information from the Provider Enrollment, Chain, and Ownership System (PECOS). During this transition, all SNF providers will be responsible to ensure their latest demographic data are updated and available in *both* the ASPEN and PECOS systems.

Please note that updates to SNF Provider demographic information do not happen in real time and can take up to six months to appear on Care Compare.

Additional information can be found on the <u>How to Update Nursing Home (NH)/Skilled Nursing Facility (SNF) Demographic Data webpage</u>.

22. Where are SNF quality measure data publicly reported?

The <u>Care Compare</u> website was launched in August 2020. It combines the Centers for Medicare & Medicaid Services (CMS) eight original provider compare sites into one place. It features updated maps and new filters to make it easier for the public to compare providers. When the "Nursing home including rehab services" provider type is chosen, the website takes reported data and puts them into a format that can be used more readily by the public to get a snapshot of the quality of care each facility provides. Providers may also download data by going to the <u>Provider Data</u> webpage and selecting from the list of datasets available.

23. Which SNF quality measures are reported on the Care Compare website?

The following quality measures are currently reported on the Care Compare website:

SNF QRP Measure Name	Measure Type	Measure Name as Displayed on Care Compare
Changes in Skin integrity Post-Acute Care: Pressure Ulcer/Injury	Assessment- based	Percentage of residents with pressure ulcers/pressure injuries that are new or worsened
Drug Regimen Review Conducted with Follow-Up for Identified Issues – PAC SNF QRP	Assessment- based	Percentage of residents whose medications were reviewed and who received follow-up care when medication issues were identified
Application of Percent of Skilled Nursing Facility (SNF) Patients with an Admission and Discharge Functional Assessment and a Care Plan that Addresses Function (NQF #2631)	Assessment- based	Percentage of SNF residents whose functional abilities were assessed and functional goals were included in their treatment plan
Application of IRF Functional Outcome Measure: Change in Self-Care (NQF #2633)	Assessment- based	Change in resident's ability to care for themselves
Application of IRF Functional Outcome Measure: Change in Mobility (NQF #2634)	Assessment- based	Change in resident's ability to move around
Application of IRF Functional Outcome Measure: Discharge Self-Care Score (NQF #2635)	Assessment- based	Percentage of residents who are at or above an expected ability to care for themselves at discharge
Application of IRF Functional Outcome Measure: Discharge Mobility Score (NQF #2636)	Assessment- based	Percentage of residents who are at or above an expected ability to move around at discharge
Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay) (NQF #0674)	Assessment- based	Percentage of SNF residents who experience one or more falls with major injury during their SNF stay
Medicare Spending per Beneficiary (MSPB) – Post-Acute Care (PAC) Skilled Nursing Facility Quality Reporting Program	Claims- based	Medicare Spending Per Beneficiary (MSPB) for residents in SNFs
Discharge to Community–Post-Acute Care (PAC) Skilled Nursing Facility Quality Reporting Program (NQF #3481)	Claims- based	Rate of successful return to home and community from a SNF
Potentially Preventable 30-Day Post- Discharge Readmission Measure for Skilled Nursing Facility Quality Reporting Program	Claims- based	Rate of potentially preventable hospital readmissions 30 days after discharge from a SNF

Facilities have a 30-day preview period before public display of the measures. Please also refer to the <u>SNF QRP Public Reporting</u> website for more information and resources related to public reporting.

24. Who can I contact with a specific question about the SNF QRP?

There are several help desks you may contact to obtain answers to specific SNF QRP questions. The help desks are listed below for your convenience.

Please note that the CMS SNF QRP and Public Reporting Help Desk email systems are not secured to receive protected health information or patient-level data with direct identifiers. Sending emails with patient-level data or protected health information to these email addresses may

be a violation of your facilities' policies and procedures, as well as a violation of federal regulations (Health Insurance Portability and Accountability Act of 1996 [HIPAA]). Do *not* submit patient-identifiable information (e.g., date of birth, Social Security number, and health insurance claim number) to these addresses. If you are not sure whether the information you are submitting is identifiable, please contact your institution's privacy officer.

Below is a list of the SNF QRP and other SNF help desks. If you are unsure which Help Desk to use, email your question to the SNF QRP Help Desk and it will be directed to the appropriate help desk:

SNF QRP

Email: SNFQualityQuestions@cms.hhs.gov

Examples of issues this help desk can assist you with:

- SNF QRP requirements
- Data submission timelines
- SNF Minimum Data Set (MDS) quality measure items and response options, i.e., Section B: Communication; Section C: Cognitive Patterns; Section GG: Functional Status; Section H: Bladder and Bowel Continence; Section I: Active Diagnoses; Section J: Health Conditions; Section K: Swallowing/Nutritional Status; Section M: Skin Conditions; Section N: Medications; Section O: Special Treatments, Procedures, and Programs
- SNF MDS assessment-based quality measures
- SNF claims-based quality measures
- SNF QRP provider training materials
- General SNF quality reporting questions

Quality Improvement and Evaluation System (QIES), Data Submission and Data Validation

Email: <u>iqies@cms.hhs.gov</u> Phone: 1-800-339-9313

Examples of issues this help desk can assist you with:

- Accessing the QIES (username and password)
- Data/record submissions
- Case mix group (CMG) classification
- MDS data submission/validation reports
- Accessing reports in the CMS designated submission system (Certification and Survey Provider Enhanced Reports [CASPER]) folders
- Technical questions that are related to MDS data specifications
- Payroll Based Journal (PBJ) data submission

Centers for Disease Control and Prevention (CDC) National Healthcare Safety Network (NHSN)

Email: nhsn@cdc.gov

Examples of issues this help desk can assist you with:

- NHSN registration
- Questions about data submitted to CMS via the CDC NHSN
- Accessing reports available in the NHSN

SNF QRP Public Reporting

Email: SNFQRPPRquestions@cms.hhs.gov

Examples of issues this help desk can assist you with:

- SNF-specific questions about the Care Compare website
- SNF data available in the <u>Provider Data Catalog</u>

SNF QRP Reconsiderations

Email: SNFQRPReconsiderations@cms.hhs.gov

Examples of issues this help desk can assist you with:

- How to file a request if a provider receives a letter of non-compliance from CMS
- Deadline for filling a Request for Reconsideration
- How to dispute a finding of non-compliance with the QRP reporting requirements that can lead to a 2% payment reduction
- Requesting information about the SNF QRP payment reduction for failure to report required quality data

Listserv Available for Provider Support for SNFs

• <u>Subscribe</u> to the Post-Acute Care (PAC) QRP listserv for the latest SNF quality reporting and the Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014 program information including but not limited to training, stakeholder engagement opportunities, and general updates about reporting requirements, quality measures, and reporting deadlines.