

PDPM FINAL RULE SNF PPS FY 2020



Presented by

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Powering Potential beyond the walls of therapy.

SNF CURRENT INDUSTRY CHALLENGES

PDPM

Savvy SNF leaders have been preparing for PDPM over the past year. Our current focus needs to be on an efficient transition of patients on October 1st and the operationalizing of PDPM for success. Identifying new drivers of success and benchmarks will be key.

STAFFING

SNF providers are challenged with hiring, onboarding, and retaining care providers. The competency, autonomy and clinical reasoning skills of SNF nursing staff has accelerated greatly to meet the demands of more chronically ill and complex patients.

MANAGED CARE

The growth of managed care and Medicare Advantage plans is dramatically impacting SNF providers. The requirements to condense length of stay, achieve better outcomes with less cost, and prevent avoidable readmissions are key to network inclusion.

CENSUS

Census challenges are common for SNF providers. Today's challenges include volume, payor mix, and length of stay. Each of these variables combine to create financial hardship and operational strain.

FINAL RULE UPDATES

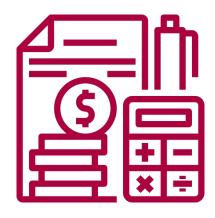
The SNF PPS Final Rule for 2020 included notable updates in three major areas.

- PDPM
- Value-Based Purchasing
- Quality Reporting Program





• Increase payment to SNF's \$851 million or 2.4% for FY 2020 compared to FY 2019.





PDPM FEDERAL RATES

FINALIZED FY 2020 URBAN AND RURAL RATES

TABLE 3: FY 2020 Unadjusted Federal Rate Per Diem--URBAN

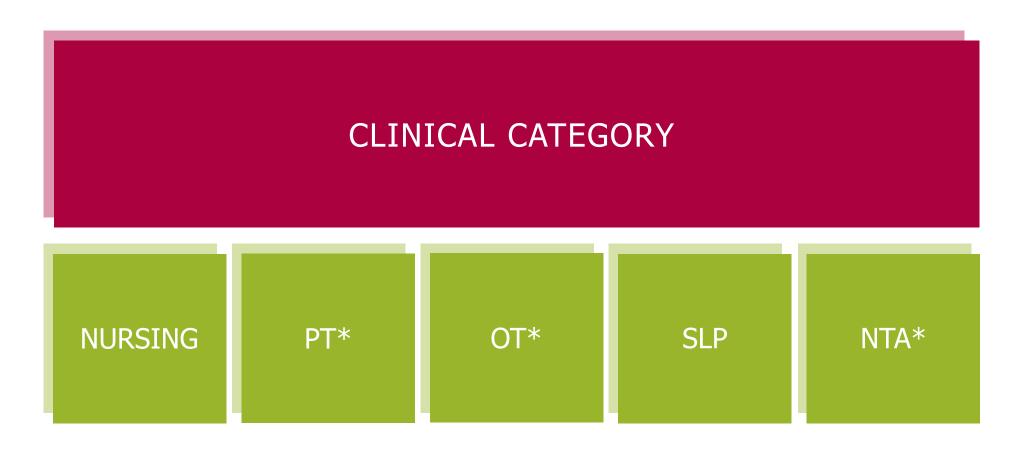
Rate Component	PT	OT	SLP	Nursing	NTA	Non-Case-Mix
Per Diem Amount	\$60.75	\$56.55	\$22.68	\$105.92	\$79.91	\$94.84

TABLE 4: FY 2020 Unadjusted Federal Rate Per Diem—RURAL

Rate Component	PT	OT	SLP	Nursing	NTA	Non-Case-Mix
Per Diem Amount	\$69.25	\$63.60	\$28.57	\$101.20	\$76.34	\$96.59



COMPONENTS UNCHANGED



^{*} Variable Per Diem Adjustment Applied



PT/OT **FINAL CMG & CMIs**

PT/OT Clinical Category	Function Score	PT/OT Case Mix Group	PT Case Mix Index	OT Case Mix Index
	0-5	TA	1.53	1.49
Major Joint Replacement	6-9	ТВ	1.70	1.63
or Spinal Surgery	10-23	TC	1.88	1.69
	24	TD	1.92	1.53
	0-5	TE	1.42	1.41
Other Orthopedic	6-9	TF	1.61	1.60
	10-23	TG	1.67	1.64
	24	TH	1.16	1.15
	0-5	TI	1.13	1.18
Medical Management	6-9	TJ	1.42	1.45
	10-23	TK	1.52	1.54
	24	TL	1.09	1.11
	0-5	TM	1.27	1.30
Non-Orthopedic Surgery	6-9	TN	1.48	1.50
And Acute Neurologic	10-23	ТО	1.55	1.55
	24	TP	1.08	1.09

SPEECH FINAL CMG & CMIs

Presence of Acute Neurologic Condition, Speech Comorbidity, Cognitive Impairment	Mechanically Altered Diet or Swallowing Disorder	ST Case Mix Group	ST Case Mix Index
	Neither	SA	0.68
None	Either	SB	1.82
	Both	SC	2.67
	Neither	SD	1.46
Any one	Either	SE	2.34
	Both	SF	2.98
	Neither	SG	2.04
Any two	Either	SH	2.86
	Both	SI	3.53
	Neither	SJ	2.99
All three	Either	SK	3.70
	Both	SL	4.21

NURSING FINAL CMIs

Nursing Category	Conditions/Services	Conditions/ Services Present	Section GG- Based Function Score	PDPM RUG	Case Mix Index
Extensive	Trach Care and Ventilator/Respirator	Yes	0-14	ES3	4.06
Services	Trach Care or Ventilator/Respirator	Yes	0-14	ES2	3.07
	Infection Isolation	Yes	0-14	ES1	2.93
		Yes	0-5	HDE2	2.40
Special Care High	Depression	No	0-5	HDE1	1.99
	Э ор. соолол	Yes	6-14	HBC2	2.24
		No	6-14	HBC1	1.86
		Yes	0-5	LDE2	2.08
Special Care Low	Depression	No	0-5	LDE1	1.73
		Yes	6-14	LBC2	1.72
		No	6-14	LBC1	1.43
	Depression	Yes	0-5	CDE2	1.87
		No	0-5	CDE1	1.62
Clinically Complex		Yes	6-14	CBC2	1.55
Cimically Complex		Yes	15-16	CA2	1.09
		No	6-14	CBC1	1.34
		No	15-16	CA1	0.94
Behavioral Cognitive		2 or More	11-16	BAB2	1.04
Symptoms	Restorative Nursing Services	0-1	11-16	BAB1	0.99
		2 or More	0-5	PDE2	1.57
		0-1	0-5	PDE1	1.47
Reduced Physical	Postorative Nursing Comises	2 or More	6-14	PBC2	1.22
Function	Restorative Nursing Services	2 or More	15-16	PA2	0.71
		0-1	6-14	PBC1	1.13
		0-1	15-16	PA1	0.66

NTA **POINT VALUE**

Final Conditions and Extensive Services for NTA Classification

TABLE 27: Conditions and Extensive Services Used for NTA Classification

Condition/Extensive Service	Source	Points
HIV/AIDS	SNF Claim	8
Parenteral IV Feeding: Level High	MDS Item K0510A2, K0710A2	7
Special Treatments/Programs: Intravenous Medication Post-admit Code	MDS Item O0100H2	5
Special Treatments/Programs: Ventilator or Respirator Post-admit Code	MDS Item O0100F2	4
Parenteral IV feeding: Level Low	MDS Item K0510A2, K0710A2, K0710B2	3
Lung Transplant Status	MDS Item I8000	3
Special Treatments/Programs: Transfusion Post-admit Code	MDS Item O0100I2	2
Major Organ Transplant Status, Except Lung	MDS Item I8000	2
Active Diagnoses: Multiple Sclerosis Code	MDS Item I5200	2
Opportunistic Infections	MDS Item I8000	2
Active Diagnoses: Asthma COPD Chronic Lung Disease Code	MDS Item I6200	2
Bone/Joint/Muscle Infections/Necrosis - Except Aseptic Necrosis of Bone	MDS Item I8000	2
Chronic Myeloid Leukemia	MDS Item I8000	2
Wound Infection Code	MDS Item I2500	2
Active Diagnoses: Diabetes Mellitus (DM) Code	MDS Item I2900	2
Endocarditis	MDS Item I8000	1
Immune Disorders	MDS Item I8000	1
End-Stage Liver Disease	MDS Item I8000	1
Other Foot Skin Problems: Diabetic Foot Ulcer Code	MDS Item M1040B	1
Narcolepsy and Cataplexy	MDS Item I8000	1
Cystic Fibrosis	MDS Item I8000	1
Special Treatments/Programs: Tracheostomy Care Post-admit Code	MDS Item O0100E2	1
Active Diagnoses: Multi-Drug Resistant Organism (MDRO) Code	MDS Item I1700	1
Special Treatments/Programs: Isolation Post-admit Code	MDS Item O0100M2	1
Specified Hereditary Metabolic/Immune Disorders	MDS Item I8000	1
Morbid Obesity	MDS Item I8000	1
Special Treatments/Programs: Radiation Post-admit Code	MDS Item O0100B2	1



NTA **POINT VALUE**

Final Conditions and Extensive Services for NTA Classification continued...

Condition/Extensive Service	Source	Points
Highest Stage of Unhealed Pressure Ulcer - Stage 4	MDS Item M0300X1	1
Psoriatic Arthropathy and Systemic Sclerosis	MDS Item I8000	1
Chronic Pancreatitis	MDS Item I8000	1
Proliferative Diabetic Retinopathy and Vitreous Hemorrhage	MDS Item I8000	1
Other Foot Skin Problems: Foot Infection Code, Other Open Lesion on Foot	MDS Item M1040A,	1
Code, Except Diabetic Foot Ulcer Code	M1040B, M1040C	1
Complications of Specified Implanted Device or Graft	MDS Item I8000	1
Bladder and Bowel Appliances: Intermittent Catheterization	MDS Item H0100D	1
Inflammatory Bowel Disease	MDS Item I8000	1
Aseptic Necrosis of Bone	MDS Item I8000	1
Special Treatments/Programs: Suctioning Post-admit Code	MDS Item O0100D2	1
Cardio-Respiratory Failure and Shock	MDS Item I8000	1
Myelodysplastic Syndromes and Myelofibrosis	MDS Item I8000	1
Systemic Lupus Erythematosus, Other Connective Tissue Disorders, and Inflammatory Spondylopathies	MDS Item I8000	1
Diabetic Retinopathy - Except Proliferative Diabetic Retinopathy and Vitreous Hemorrhage	MDS Item I8000	1
Nutritional Approaches While a Resident: Feeding Tube	MDS Item K0510B2	1
Severe Skin Burn or Condition	MDS Item I8000	1
Intractable Epilepsy	MDS Item I8000	1
Active Diagnoses: Malnutrition Code	MDS Item I5600	1
Disorders of Immunity - Except : RxCC97: Immune Disorders	MDS Item I8000	1
Cirrhosis of Liver	MDS Item I8000	1
Bladder and Bowel Appliances: Ostomy	MDS Item H0100C	1
Respiratory Arrest	MDS Item I8000	1
Pulmonary Fibrosis and Other Chronic Lung Disorders	MDS Item I8000	1



NON-THERAPY ANCILLARY FINAL CMG & CMIs





DAY 1 − 20 Full rate of reimbursement

Medicare Payment Days	Adjustment Factor
1-20	1.00
21-27	0.98
28-34	0.96
35-41	0.94
42-48	0.92
49-55	0.90
56-62	0.88
63-69	0.86
70-76	0.84
77-83	0.82
84-90	0.80
91-97	0.78
98-100	0.76

DAY 21 - 272% reduction in rate

DAY 28 - 34 2% reduction in rate

NTA Adjustment Factor

Medicare Payment Days	Adjustment Factor
1-3	3.0
4-100	1.0

PT/OT Adjustment Factor

INTERIM PAYMENT ASSESSMENT



The Interim Payment Assessment (IPA) is OPTIONAL and providers will determine their own criteria for when an IPA is needed based on clinical changes throughout the stay:

- 1. The ARD for the IPA will be the date the facility chooses to complete the assessment
- 2. Payment based on the IPA will begin the same date as the ARD
- 3. The MDS item set used for an IPA will be the same as the 5-day PPS Assessment





DEFINITION

- Group therapy for SNF providers is designated as 2-6 residents.
- This aligns consistency in payment policies across PAC settings.
- Stipulations remain 75% of therapy minutes must be individual with maximum of 25% of minutes combined for group and concurrent for each discipline.



PROCESS FOR ICD010 CODE **REVISIONS**

- CMS approved a sub-regulatory process for updating ICD-10 code mappings and lists associated with PDPM.
- Updates will be publicly posted on CMS's PDPM website.
- In June after FY 2020 SNF Proposed Rule was issued, CMS released the FY 2020 ICD-10 Code updates. Access this by clicking here.





VALUE-BASED PURCHASING **UPDATES**

- Changing name to SNFPPR to "Skilled Nursing Facility Potentially Preventable Readmissions after Hospital Discharge"
- Update to reporting requirements to ensure that CMS publishes accurate performance information for low volume SNFs







QUALITY REPORTING PROGRAM UPDATES

QUALITY REPORTING PROGRAM UPDATES

FY 2021 HAS 11 SNF QRP MEASURES

TABLE 12: Quality Measures Currently Adopted for the FY 2021 SNF QRP

Short Name	Measure Name & Data Source			
Resident Assessment Instrument Minimum Data Set				
Pressure Ulcer/Injury	Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury.			
Application of Falls	Application of Percent of Residents Experiencing One or More Falls with Major			
	Injury (Long Stay) (NQF #0674).			
Application of Functional	Application of Percent of Long-Term Care Hospital (LTCH) Patients with an			
Assessment/Care Plan	Admission and Discharge Functional Assessment and a Care Plan That Addresses			
	Function (NQF #2631).			
Change in Mobility Score	Application of IRF			
	Functional Outcome Measure: Change in Mobility Score for Medical			
	Rehabilitation Patients (NQF #2634).			
Discharge Mobility Score	Application of IRF Functional Outcome Measure: Discharge Mobility Score for			
	Medical Rehabilitation Patients (NQF #2636).			
Change in Self-Care Score	Application of the IRF Functional Outcome Measure: Change in Self-Care Score			
	for Medical Rehabilitation Patients (NQF #2633).			
Discharge Self-Care Score	Application of IRF Functional Outcome Measure: Discharge Self-Care Score for			
	Medical Rehabilitation Patients (NQF #2635).			
DRR	Drug Regimen Review Conducted With Follow-Up for Identified Issues-Post			
	Acute Care (PAC) Skilled Nursing Facility (SNF) Quality Reporting Program			
	(QRP).			
	Claims-Based			
MSPB SNF	Medicare Spending Per Beneficiary (MSPB)-Post Acute Care (PAC) Skilled			
	Nursing Facility (SNF) Quality Reporting Program (QRP).			
DTC	Discharge to Community (DTC)-Post Acute Care (PAC) Skilled Nursing Facility			
	(SNF) Quality Reporting Program (QRP).			
PPR	Potentially Preventable 30-Day Post-Discharge Readmission Measure for Skilled			
	Nursing Facility (SNF) Quality Reporting Program (QRP).			

^{*} Discharge to Community Post Acute Care SNF QRP measure will exclude baseline nursing home residents



QUALITY REPORTING PROGRAM UPDATES

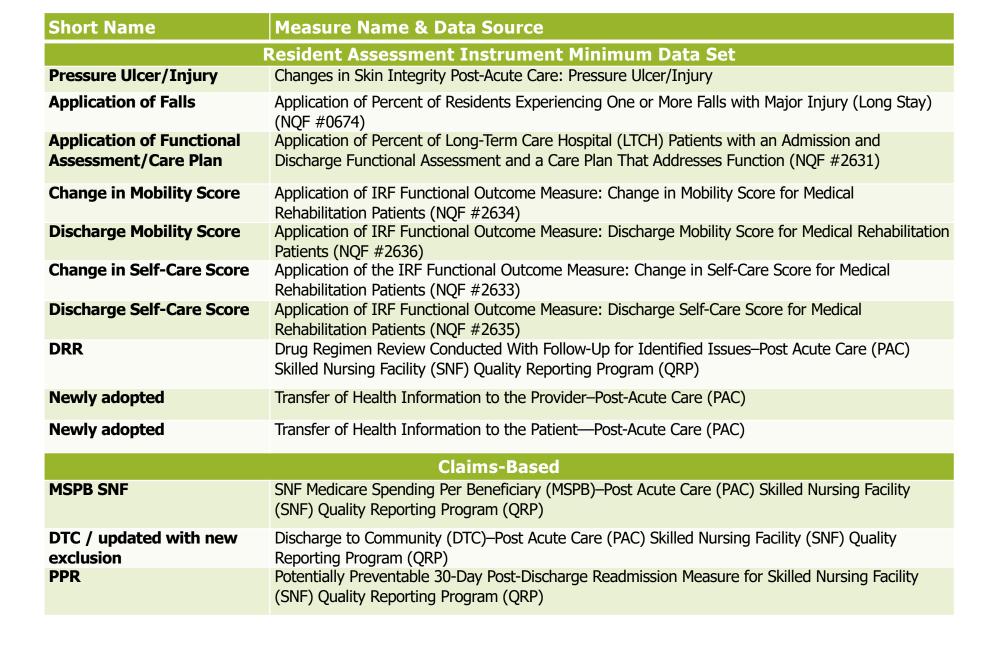
Two new SPADE quality measures were added to assess whether certain health information is provide by the SNF at the time of transfer or discharge which will begin with FY 2022 SNF QRP and includes:

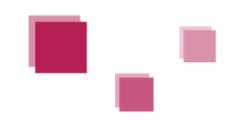
- Transfer of health information to the Provider-Post-Acute-Care
- Transfer of health information to the Patient-Post-Acute-Care



FY 2022 SNF QRP

PROGRAM YEAR QMs







- New program SPADEs (Standardized Patient Assessment Data Elements) beginning with FY 2022 will include 75 assessment data (SPADE) elements including the following categories:
 - Functional Status
 - Cognitive Function
 - Special Services, Treatments, and Interventions
 - Medical Conditions and Comorbidities
 - Impairments
 - Other categories deemed necessary and appropriate
- Data collection will begin October 1, 2020 through December 31, 2020 for the FY 2022 SNF QRP
- We can expect the MDS form to change October 1, 2020 to support the SPADEs program



QUALITY REPORTING PROGRAM UPDATES

- To accommodate the new reporting, CMS has reported that it will add "only 59.5 items across the PPS admission and PPS discharge assessments."
- CMS intends for the SPADE data to "inform care planning, the common standards and definitions to facilitate interoperability, and to allow for comparing assessment data for standardized measures." Consequently, SNFs should anticipate the use of SPADEs in the SNF QRP QMs to continue to grow through future rulemaking.
- Summary of SPADE adoptions for FY 2022 (effective October 1, 2020) by category not including the two new SPADEs involved in the Transfer of Health Information QMs.



QUALITY REPORTING PROGRAM

UPDATES

Cognitive Function and Mental Status Data:

- Brief Interview for Mental Status (BIMS): Adopted as proposed;
- Confusion Assessment Method (CAM): Adopted as proposed; and
- Patient Health Questionnaire-2 to 9 (PHQ-2 to 9): Adopted as proposed.

Special Services, Treatments, and Interventions Data:

- Cancer Treatment: Chemotherapy (IV, Oral, Other): Adopted as proposed.
- b) Cancer Treatment: Radiation: Adopted as proposed.
- Respiratory Treatment: Oxygen Therapy (Intermittent, Continuous, High-Concentration Oxygen Delivery System): Adopted as proposed. c)
- Respiratory Treatment: Suctioning (Scheduled, As needed): Adopted as proposed.
- e) Respiratory Treatment: Tracheostomy Care: Adopted as proposed.
- Respiratory Treatment: Non-invasive Mechanical Ventilator (BiPAP, CPAP): Adopted as proposed. f)
- Respiratory Treatment: Invasive Mechanical Ventilator: Adopted as proposed.
- g) h) Intravenous (IV) Medications (Antibiotics, Anticoagulants, Vasoactive Medications, Other): Adopted as proposed.
- Transfusions: Adopted as proposed.
- Dialysis (Hemodialysis, Peritoneal dialysis): Adopted as proposed. j)
- Intravenous (IV) Access (Peripheral IV, Midline, Central line); Adopted as proposed.
- Nutritional Approach: Parenteral/IV Feeding: Adopted as proposed. I)
- Nutritional Approach: Feeding Tube: Adopted as proposed.
- Nutritional Approach: Mechanically Altered Diet: Adopted as proposed. n)
- Nutritional Approach: Therapeutic Diet: Adopted as proposed. 0)
- High-Risk Drug Classes: Use and Indication: Adopted as proposed.

Medical Condition and Comorbidity Data:

Pain Interference (Pain Effect on Sleep, Pain Interference with Therapy Activities, and Pain Interference with Day-to-Day Activities): Adopted as proposed.

Impairment Data:

- Hearing: Adopted as proposed. a)
- Vision: Adopted as proposed.

New Category: Social Determinants of Health (SDOH) Data:

- Race: Adopted as proposed. 1)
- 2) Ethnicity: Adopted with one technical change, i.e., the addition of the work "of" to the question, "Are you of Hispanic, Latino/a, or Spanish origin?"
- Preferred Language: Adopted with the modification that CMS will deem SNFs that submit this SPADE with respect to admission to have submitted with respect to discharge as well.
- Interpreter Services: Adopted with the modification that CMS will deem SNFs that submit this SPADE with respect to admission to have submitted with respect to discharge as well.
- Health Literacy: Adopted as proposed.
- Transportation: Adopted as proposed.
- Social Isolation: Adopted as proposed.



- Be sure you are using updated urban and rural rates for financial analysis and prospective PDPM
- Use final CMIs and CMGs for therapy, nursing and NTA
- Be aware that residents in your SNF could be in groups of 2 6 for education and patient engagement
- IPA remains optional
- Know the 11 SNF QRP measures for FY 2021
- Be familiar with the FY 2022 SNF QRP QMs and the 2 new QMs related to information transfer
- Understand the new SPADEs program for FY 2022, the assessment elements and categories
- 34 DAYS LEFT TO MAKE FINAL PREPARATIONS FOR PDPM!



CONCEPT REHAB'S SNF RESOURCE CENTER

In order to keep you and your interdisciplinary team up to date, download our revised PDPM Quick Guides that include the Final Rule revisions and updates.



Download Now



CONCEPT REHAB'S CROSSWALK TOOL



Pre-populated SNF Data

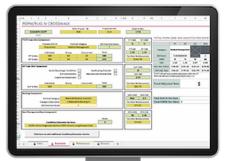


Interactive Data Modeling



Instruction & Resources











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