

Centers for Medicare & Medicaid Services
Questions and Answers from Open Door Forum:
Skilled Nursing Facilities/Long Term Care

April 15, 2021

1. First of all, a comment on the parity adjustment that John talked about. I want to just reiterate the information that came in the proposed rule and just the indications that were mentioned about resource use, and behavior change on the SNF provider side with a 30% reduction in rehab minutes. And just a suggestion and a comment, something I'm certainly going to send into the comments the proposed rule, that CMS would perhaps consider a prorated adjustment to the PT and OT segments of PDPM based on provider compliance with not reducing their minutes might be helpful. The second, the question that I have has to do with the COVID-19 vaccination NHSN requirements and this wasn't mentioned in the proposed rule. But the question I have is, because it's not an MDS-based or a claims-based piece of information, will the reporting requirement also factor into the 2% wage index adjustment based on QRP?
 - a. This will become a part of the SNF QRP program. So non-compliance with reporting, this measure via the NHSN, if finalized would impact the annual payment update.
2. I'm wondering if you can address the value-based purchasing proposed changes as well. I've been reading that there's depression of the 30-day all cause readmission measure, so what might be replacing that?
 - a. There is no other measure within the value-based purchasing program. So with the suppression of the single measure, we would therefore not have any measures. There are no measures proposed this year to replace it is to your question. The measures that are under consideration that I referenced, a couple of them were a part of a future expansion. There is no expansion for this year. With that suppression of that single measure in the SNF QRP program, we would the zero score and payment adjustments as I described.
3. Is there a date set for when the three-day acute care hospital stay requirement prior to the covered SNF or skilled swing bed stay waiver will end?
 - a. We have not currently released any sort of date or deadline for when the three-day waiver will be rescinded.
4. I'm wondering if the QRP outcomes are going to be measured like (ZVP) anytime in the future and tied to any risk of payment reduction? So, not completion of information, but the actual outcomes themselves.
 - a. We don't have any plans to make those adjustments at this time and any adjustments would go through notice and comment rulemaking. I think what you're asking me if we're considering switching from a pay for reporting program to a pay for performance program.
 - i. Yes, correct.

5. I have more of a thematic question. Just wondering how you guys are thinking about Biden's proposed infrastructure plan with the \$400 billion going into primarily home health care. How you guys think that's going to impact the skilled nursing industry and two, how you guys are taking those proposed plans into account with your proposed rules.
 - a. I don't think we have anyone on the call that would be able to actually address that question. So thank you for the question and you can always feel free to submit questions to the SNF open door forum, LTC mailbox.