

What's Impacting Your Revenue?

PDPM, QRP, VBP, QIP, CMI......

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Objectives

- Census Impact of COVID-19
- Review potential impacts on revenue
 - Potential Withholdings/Offset
 - Potential Reimbursement and How To Optimize
- What to expect in the future



Where Do You Focus?

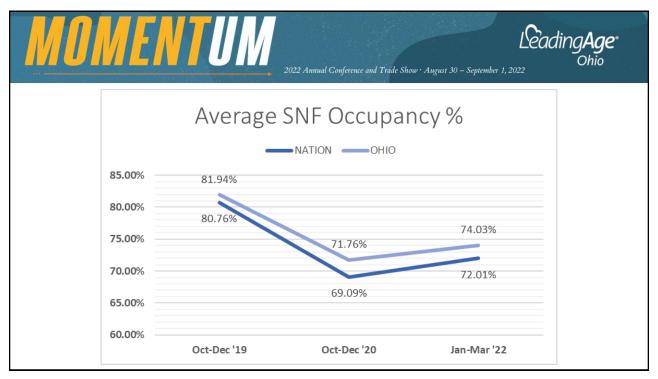
- Census Does it still fix everything?
 - Reimbursement Rates
 - Potential Penalty and Takeback
 - · Reimbursement tied to Quality
- Increased Expenses
 - PPE
 - Staffing
 - Increased Costs Across The Board

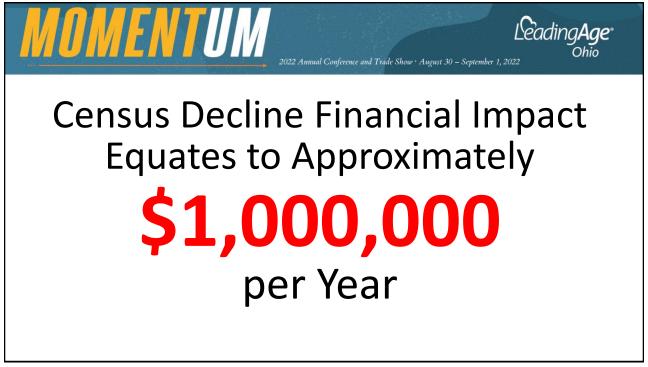


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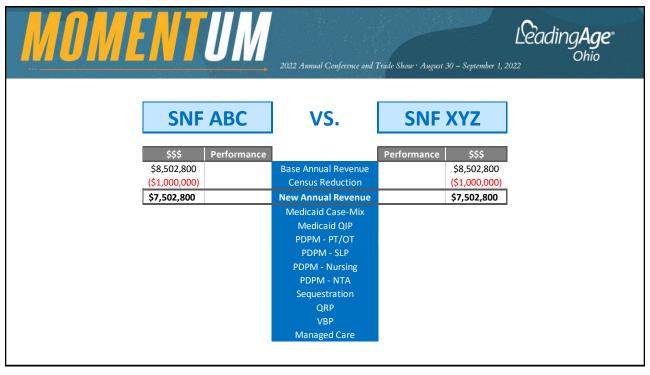


CENSUS











QIP
 Quality Incentive Program

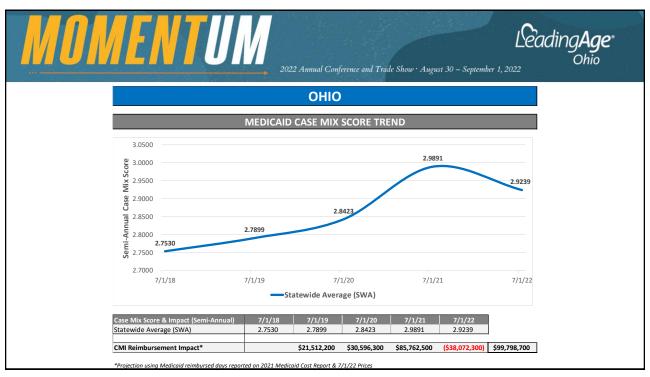
PDPM
 Patient Driven Payment Model

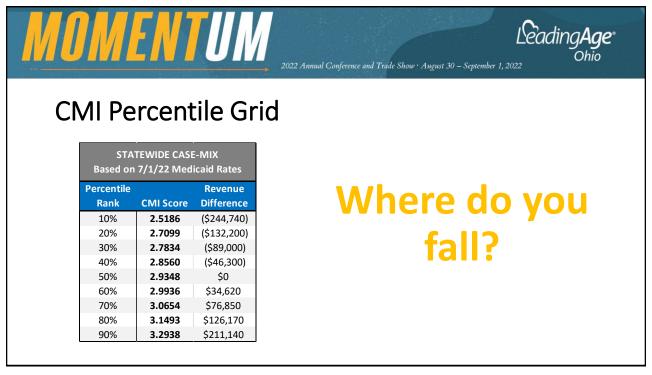
THE ODDS OF HITTING YOUR TARGET GO UP DRAMATICALLY WHEN YOU AIM AT IT.

QUOTEHD.COM Mail Pancoast

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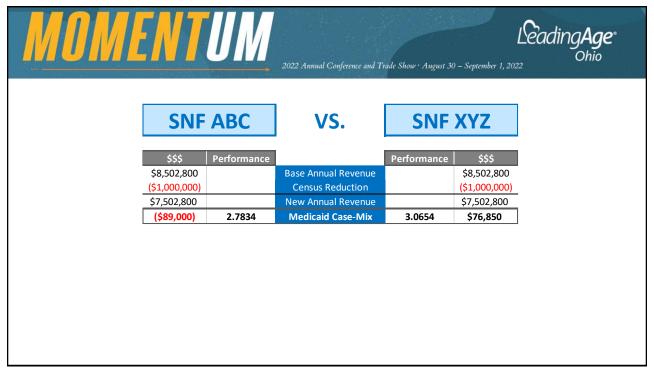




CMI – Focus for Review

- Average ADL Distribution
- PHQ-9 Total Severity Score
- Therapy RUG Distribution
 - Are you <u>optimizing</u> therapy RUGs in combination with ADL scores?
- Nursing RUG Distribution
- Walking rounds (therapy and nursing), asking staff and residents about changes in function may identify residents for screening

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QUALITY INCENTIVE PAYMENT (QIP)

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Medicaid Quality Incentive Payment

July 1, 2022 Rate

- 225 facilities did not meet the threshold to receive QIP reimbursement
- \$61 million in missed QIP opportunity
- Of the 225 facilities, 75 were non-profit
- That is a loss of \$21 million.

33% of non-profit facilities did not receive QIP reimbursement







Medicaid Quality Incentive Payment

QIP is calculated using CMS assigned points for four long-stay measures

- Four Long Stay Measures
 - UTI, High Risk Pressure Ulcers, Catheters, Mobility Decline
- CMS assigned points are divided by 20, for max points of 22.5
 - UTI 100/20 = 5 points
 - Mobility Decline 150/20 = 7.5 points
 - Catheters 100/20 = 5 points
 - High Risk Pressure Ulcers 100/20 = 5 points
- Providers in the lowest percentile based on points assigned by CMS would receive zero points for each QM

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Medicaid Quality Incentive Payment

Statistics & Averages

- Rate per point
 - FY22 was \$1.32
 - FY23 was \$1.82
- Average number of points
 - FY22 was 14.53
 - FY23 was 16.00



Medicaid Quality Incentive Payment FY23 & Future

- · Budget for FY23 for QIP
 - FY23 \$295 Million (7/1/22 to 6/30/23)
 - FY23 rate per point is \$1.82
 - Bottom 25th percentile did not receive QIP funding
 - Cut Off QIP points FY22 9.5
 - Cut Off QIP points FY23 10.75
- Proposal going forward is to include all long-term quality measures in the calculation
 - Improving overall Quality Measures will improve reimbursement and 5-Star

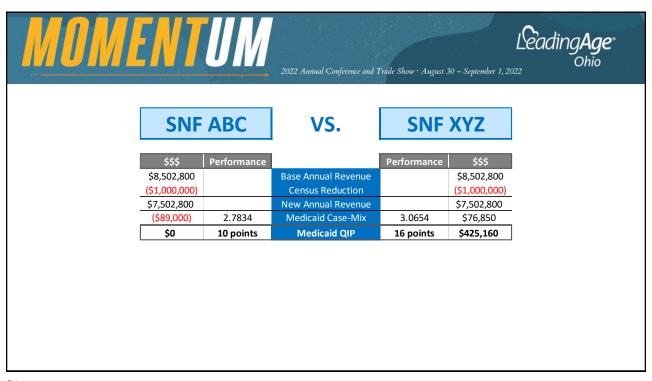
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Ohio Reimbursement and Quality Compared

	Average Medicaid Case-Mix for Each Star Level						
Star Rating	Overall	Survey	QM - Total	QM - LS	QM - SS	Staffing	RN Staffing
1	2.9840	2.9520	2.9440	3.0068	2.9319	3.0252	3.0295
2	2.9899	2.9976	2.9309	2.9646	3.0136	3.0406	3.0315
3	2.9750	2.9937	3.0243	3.0115	2.9978	2.9451	2.9774
4	3.0331	3.0200	2.9886	2.9574	3.0189	2.8970	2.9164
5	2.9632	2.9641	2.9933	3.0077	3.0102	2.6907	2.7414

Statewide in Ohio, nursing home quality star rating does not decline with increased reimbursement







Fiscal Year 2023

- Overall Net Rate Increase +2.7%
 - SNF Market Basket +3.9%
 - Market Basket Error Adjustment +1.5%
 - Productivity Adjustment -0.3%
 - Recalibrated Parity Adjustment -2.3%
 - Case-Mix Adjustment
 - Two-Year phase in for this recalibration

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Average PDPM Component CMI Per Stay (FY2020-FY2021) PT OT SLP Nursing NTA 1.52 1.52 1.67 1.60 1.20



PDPM - PT/OT

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Primary Tier

Collapsed PT and OT Clinical Category	PDPM Clinical Category	
Major Joint Replacement or Spinal Surgery	Major Joint Replacement or Spinal Surgery	
Non-Orthopedic Surgery and Acute Neurologic	Non-Orthopedic Surgery	
Non-Orthopedic Surgery and Acute Neurologic	Acute Neurologic	
	Non-Surgical Orthopedic / Musculoskeletal	
Other Orthopedic	Orthopedic Surgery (Except Major Joint	
	Replacement or Spinal Surgery)	
	Medical Management	
	Acute Infections	
Medical Management	Cancer	
	Pulmonary	
	Cardiovascular and Coagulations	

• ICD-10 Code – over 65,000 diagnosis codes



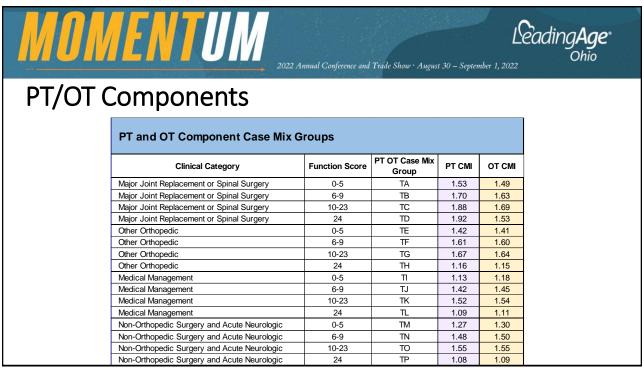
GG0170J1 Walk 50 Feet with Two Turns

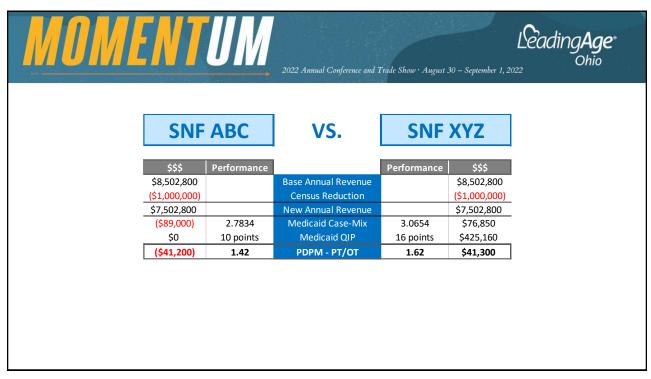
GG0170K1 Walk 150 Feet

0-4 (average)

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Walking











SLP Component

Primary Tier

Three Criteria

1. Acute Neurologic Condition – nearly 2,000 ICD-10 Codes

2. SLP-Related Comorbidity

I4300 Aphasia
I4500 CVA, TIA, Stroke
I4900 Hemiplegia or Hemiparesis
I5500 Traumatic Brain Injury
O0100E2 Tracheostomy Care While a Resident
O0100F2 Ventilator or Respirator While a Resident
I8000 Laryngeal Cancer
I8000 Aprawa
I8000 Dysphagia
I8000 ALS
I8000 Oral Cancers
I8000 Speech and Language Deficits

3. Cognitive Impairment

PDPM Cognitive Level	BIMS Score	Staff Assessment Score
1 - Cognitively Intact	13-15	0
2 - Mildly Impaired	8-12	1-2
3 - Moderately Impaired	0-7	3-4
4 - Severely Impaired	-	5-6

*Note: Residents are classified as cognitively impaired when they are assessed to be mildly, moderately, or severely impaired

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SLP Component

Comorbidities Included in SLP Component			
Condition	ICD-10-CM Code	Description	
ALS	G12.21	Amyotrophic lateral sclerosis	
Apraxia	169.990	Apraxia following unspecified cerebrovascular disease	
Dysphagia	169.991	Dysphagia following unspecified cerebrovascular disease	
Laryngeal Cancer	C32.0	Malignant neoplasm of glottis	
Laryngeal Cancer	C32.1	Malignant neoplasm of supraglottis	
Laryngeal Cancer	C32.2	Malignant neoplasm of subglottis	
Laryngeal Cancer	C32.3	Malignant neoplasm of laryngeal cartilage	
Laryngeal Cancer	C32.8	Malignant neoplasm of other specified sites of larynx	
Laryngeal Cancer	C32.9	Malignant neoplasm of larynx, unspecified	
Oral Cancers	C00.0	Malignant neoplasm of external upper lip	
Oral Cancers	C00.1	Malignant neoplasm of external lower lip	
Oral Cancers	C00.3	Malignant neoplasm of upper lip, inner aspect	
Oral Cancers	C00.4	Malignant neoplasm of lower lip, inner aspect	
Oral Cancers	C00.5	Malignant neoplasm of lip, unspecified, inner aspect	

continued....





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SLP Component

Secondary Tier

Two Criteria

1. Swallowing Disorder

K0100A Loss of liquids/solids from mouth when eating or drinking

K0100B Holding food in mouth/cheeks or residual food in mouth after meals

K0100C Coughing or choking during meals or when swallowing medications

K0100D Complaints of difficulty or pain with swallowing

K0100Z None of the above

2. Mechanically Altered Diet

K0510C2 Mechanically Altered Diet While a Resident

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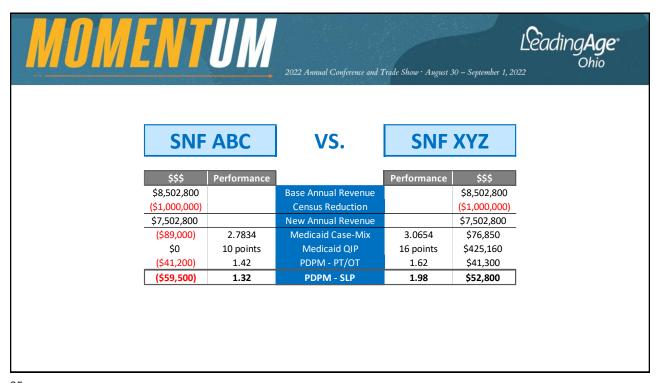




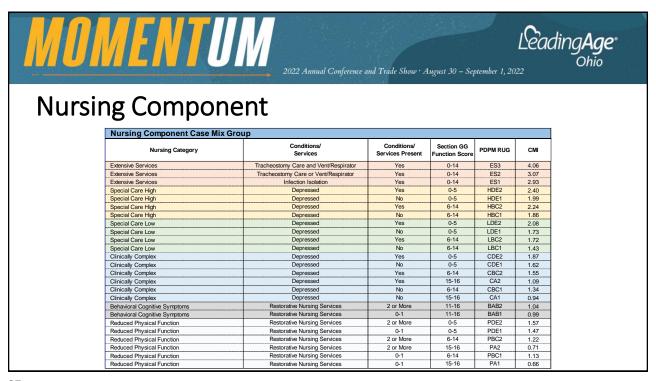
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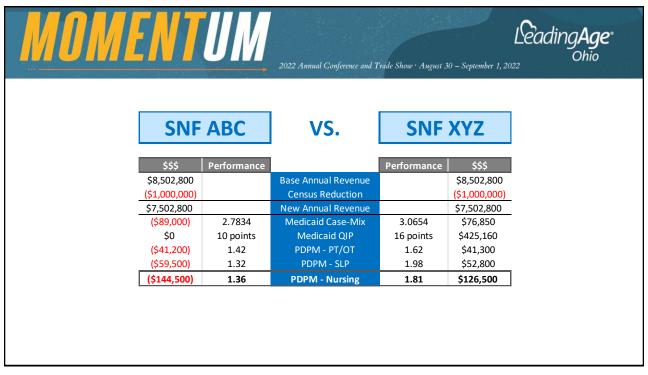
SLP Component

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





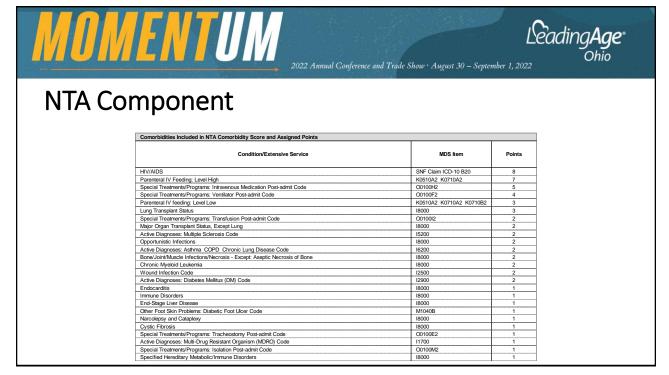






PDPM - NTA

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NTA Component

Comorbidities Included in NTA Comorbidity Score and Assigned Points		
Condition/Extensive Service	MDS Item	Points
Morbid Obesity	18000	1
Special Treatments/Programs: Radiation Post-admit Code	O0100B2	1
Highest Stage of Unhealed Pressure Ulcer - Stage 4	M0300X1	1
Psoriatic Arthropathy and Systemic Sclerosis	18000	1
Chronic Pancreatitis	18000	1
Proliferative Diabetic Retinopathy and Vitreous Hemorrhage	18000	1
Other Foot Skin Problems: Foot Infection Code, Other Open Lesion on Foot Code, Except Diabetic Foot Ulcer Code	M1040A M1040B M1040C	1
Complications of Specified Implanted Device or Graft	18000	1
Bladder and Bowel Appliances: Intermittent catheterization	H0100D	1
Inflammatory Bowel Disease	18000	1
Aseptic Necrosis of Bone	18000	1
Special Treatments/Programs: Suctioning Post-admit Code	O0100D2	1
Cardio-Respiratory Failure and Shock	18000	1
Myelodysplastic Syndromes and Myelofibrosis	18000	1
Systemic Lupus Erythematosus, Other Connective Tissue Disorders, and Inflammatory Spondylopathies	18000	1
Diabetic Retinopathy - Except : Proliferative Diabetic Retinopathy and Vitreous Hemorrhage	18000	1
Nutritional Approaches While a Resident: Feeding Tube	K0510B2	1
Severe Skin Burn or Condition	18000	1
Intractable Epilepsy	18000	1
Active Diagnoses: Malnutrition Code	15600	1
Disorders of Immunity - Except : RxCC97: Immune Disorders	18000	1
Cirrhosis of Liver	18000	1
Bladder and Bowel Appliances: Ostomy	H0100C	1
Respiratory Arrest	18000	1
Pulmonary Fibrosis and Other Chronic Lung Disorders	18000	1

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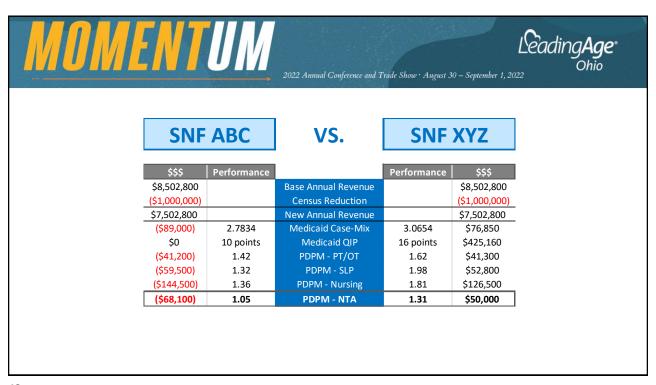
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NTA Component

NTA Component Case Mix Group			
NTA Comorbidity Score	NTA Case Mix Group	СМІ	
12+	NA	3.24	
9-11	NB	2.53	
6-8	NC	1.84	
3-5	ND	1.33	
1-2	NE	0.96	
0	NF	0.72	

Length of Stay Adjustment

Variable Per-diem Adjustment Factors and Schedule			
Medicare Payment Days	Adjustment Factor		
1-3	3.00		
4-100	1.00		





PDPM – Best Practices

- Under PDPM Team Approach
 - Skilled Services Not Only About Therapy
 - Should Not Hear "Therapy Cut Them" as the reason no longer skilled
 - Other Questions
 - What Nursing Services Are Needed?
 - What Are The Comorbidities?
 - Does the diagnosis, coding, and resident history all correlate?



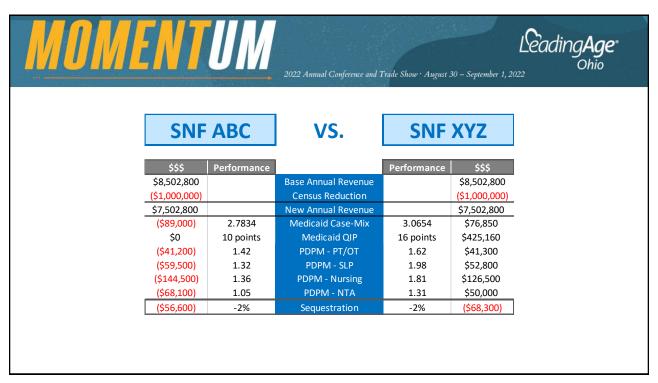
Sequestration

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Revenue – CMS Offsets/Withholdings

- Sequestration 2%
 - Was suspended April 2020 to March 2022
 - Phased back in with 1% effective April 2022 to June 2022
 - Full 2% is now effective July 2022
- QRP (Quality Reporting Program) 2%
- VBP (Value Based Purchasing) 2%







QRP (Quality Reporting Program) – 2%

The Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014 modified the Social Security Act requiring that SNFs be required to submit data for public reporting. In response, the Centers for Medicare & Medicaid Services (CMS) established the SNF QRP and authorized the Secretary to report quality measures that relate to care provided by SNFs on a CMS website.

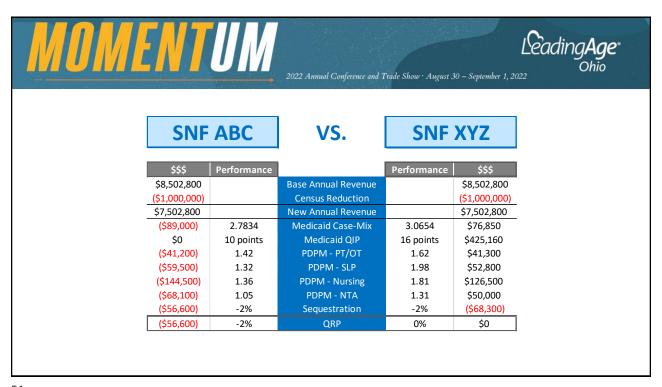
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Revenue – CMS Offsets/Withholdings

QRP (Quality Reporting Program) – 2%

For Fiscal Year (FY) 2018, and each subsequent year, if a SNF fails to submit the required quality data, the SNF will be subject to a two percentage (2%) point reduction in the Annual Payment Update (APU) for the applicable performance year.







VBP (Value Based Purchasing) - 2%

The Centers for Medicare & Medicaid Services (CMS) awards incentive payments to skilled nursing facilities (SNFs) through the SNF VBP Program to encourage SNFs to improve the quality of care they provide to Medicare beneficiaries. Performance in the SNF VBP Program is currently based on a single measure of all-cause hospital readmissions.

In Section 215 of the <u>Protecting Access to Medicare Act of 2014 (PAMA)</u>, Congress added sections 1888(g) and (h) to the Social Security Act, which required the Secretary of the Department of Health and Human Services (HHS) to establish a SNF VBP Program. The Program began affecting SNF payments on October 1, 2018.

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Revenue – CMS Offsets/Withholdings

VBP (Value Based Purchasing) – 2%

As required by statute, CMS withholds 2% of SNFs' Medicare fee-for-service (FFS) Part A payments to fund the program. This 2% is referred to as the "withhold".

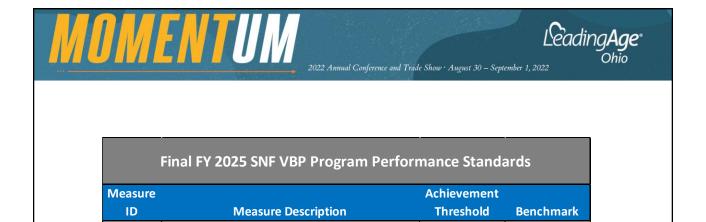
CMS is required to redistribute between 50% and 70% of this withhold to SNFs as incentive payments. CMS redistributes 60% of the withhold to SNFs as incentive payments, and the remaining 40% of the withhold is retained in the Medicare Trust Fund.



VBP (Value Based Purchasing) – 2%

The SNF VBP Program currently awards incentive payments to SNFs based on their performance on the SNF 30-Day All-Cause Readmission Measure, the rate of all-cause, unplanned hospital readmissions for SNF residents within 30 days of discharge from a prior hospital stay. It is risk adjusted for patient demographics, comorbidities, and other health status variables that affect the probability of a hospital readmission, including diagnoses of COVID-19.

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20.86%

17.09%

SNF 30-Day All-Cause Readmission Measure

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SNFRM



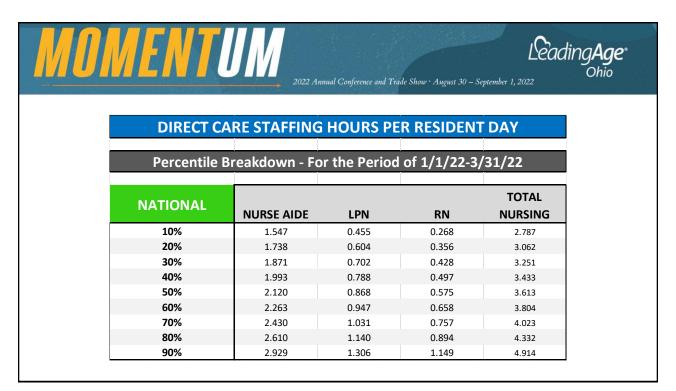
VBP (Value Based Purchasing) - 2%

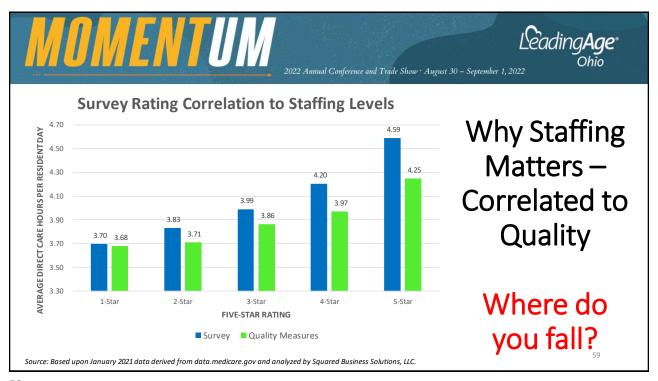
In the <u>FY 2023 SNF PPS final rule</u>, CMS adopted two additional measures for use beginning in the FY 2026 SNF VBP Program year:

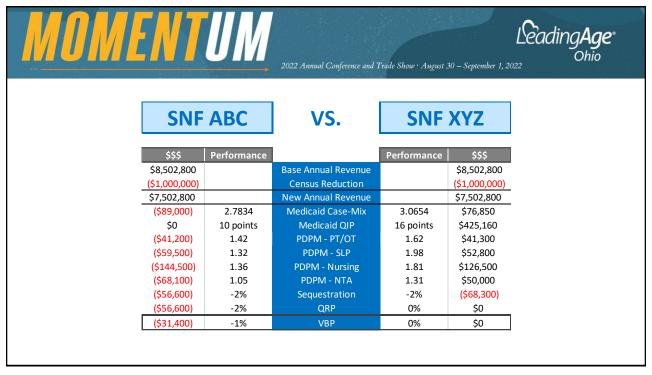
- 1) Skilled Nursing Facility Healthcare-Associated Infections (SNF HAI) Requiring Hospitalization measure
- Total Nurse Staffing Hours per Resident Day (Total Nurse Staffing) (including Registered Nurse [RN], Licensed Practical Nurse [LPN], and Nurse Aide hours) measure.

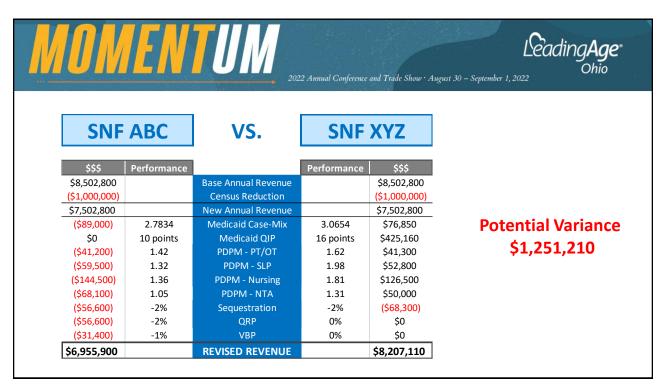
CMS also adopted one additional measure for use beginning in the FY 2027 SNF VBP Program year: Discharge to Community (DTC)

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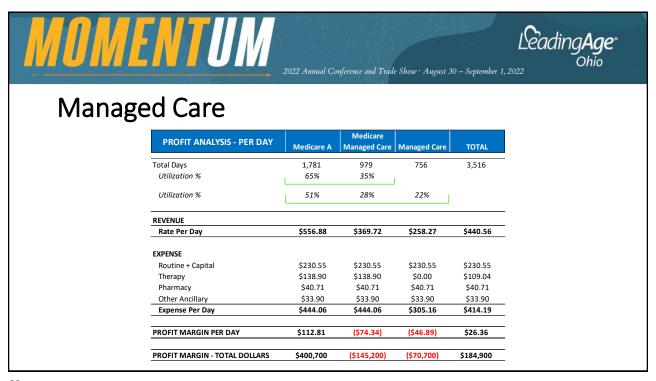


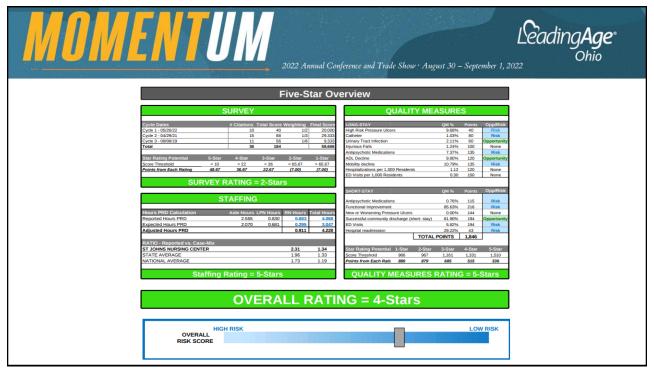




Managed Care

- Enrollment in Plans continues to increase
- Some Plans require 3-Star and have Quality Requirements
- Management of each case based on reimbursement and care needs
- Reimbursement Challenges
 - PDPM
 - Negotiated Rates







Next Steps:

- Where does your facility currently stand?
 CMI, QIP, 5-Star, VBP, QRP
- What is your current average PDPM rate?
- Who is responsible for these outcomes?
 Team Approach
- Provide Education-Tools for Your Team
- Create dashboard or management tools Check-in/Monitor



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Future Reimbursement

- CMS pushing for States to hold providers accountable for better quality of care and the push for minimum staffing
- Additional Quality Measures being added for VBP and QRP
- Quality Incentive Payment (QIP) expanding to all long-term measures

REIMBURSEMENT TIED TO QUALITY



THANK YOU

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