

**INPATIENT REHABILITATION FACILITY
QUALITY REPORTING PROGRAM (IRF QRP)
QUESTIONS AND ANSWERS**

Current as of November 2016



#	Question Category	Question	Answer
General IRF QRP Questions			
1.	IRF QRP Overview and Data Submission Deadlines	What are the current requirements of the IRF Quality Reporting Program (IRF QRP)?	<p>The Centers for Medicare and Medicaid Services' IRF QRP requires that IRFs submit quality measure data to CMS. Failure to submit the required quality data will result in a two (2) percentage point reduction in the IRF's annual payment update (APU). Beginning with the FY 2016 payment determination and for each subsequent year, IRFs must meet or exceed two separate data completeness thresholds: one threshold set at 95 percent for completion of quality measures data collected using the IRF-PAI submitted through the QIES and a second threshold set at 100 percent for quality measures data collected and submitted using the CDC NHSN.</p> <p>The IRF Quality Reporting Program (QRP) is described on the following web site: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/</p> <p>A list of the current quality measures is available on the following web site: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Program-Measures-Information-.html</p> <p>The data submission deadlines are provided on the following web page: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Data-Submission-Deadlines.html</p>
2.	Rehabilitation Units participating in the IRF QRP	<p>My IRF is in Maryland. Is our facility included in the IRF QRP?</p> <p>Do we need to report healthcare-acquired infection data under the IRF QRP?</p>	<p>To determine whether a rehabilitation unit/hospital is included in the Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP), the provider must determine whether it is being paid under Medicare's IRF Prospective Payment System (PPS). If any of the following are true for a freestanding IRF or IRF unit, the IRF is paid under the IRF PPS and is subject to the requirements of the IRF QRP:</p> <ul style="list-style-type: none"> • The Medicare provider number ends in 3025-3099, or • The Medicare provider number has a "T" in the 3rd position, or • The Medicare provider number has an "R" in the 3rd position <p>If any of the above criteria are true for the IRF, the IRF must comply with IRF QRP. Failure to submit the required quality data will result in a two (2) percentage point reduction in the IRF's annual payment update.</p> <p>For more information about the IRF QRP, please visit http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/index.html</p> <p>Please check with your state about any State-specific requirements related to submission of quality data, including healthcare-acquired infection data.</p>

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3.	IRF QRP Information Resources	What resources are available to remain informed about the IRF Quality Reporting Program (QRP)?	<p>Several resources are available to help you stay informed about the IRF Quality Reporting Program (IRF QRP):</p> <ol style="list-style-type: none"> 1) IRF QRP and IRF Prospective Payment System (PPS) websites: <ol style="list-style-type: none"> a) IRF QRP web site: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/index.html b) The "Spotlights and Announcements" page of the IRF QRP website announces updates: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/Spotlights-Announcements.html c) IRF-PPS web site: http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/InpatientRehabFacPPS/Spotlight.html 2) Proposed Rules and Final Rules are published in the Federal Register and are typically released each year in April and August. Proposed and Final Rules are posted on both of these webpages: <ol style="list-style-type: none"> a) https://www.federalregister.gov/ b) http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/InpatientRehabFacPPS/List-of-IRF-Federal-Regulations.html; 3) To receive mailing list notices and announcements about the IRF QRP, sign up at: https://public.govdelivery.com/accounts/USCMS/subscriber/new 4) CMS Open door forums and listening sessions. Notices about CMS Open Door Forums related to the IRF QRP are announced on the following web page: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/Spotlights-Announcements.html 5) There are several help desks that IRF staff may contact to get answers for specific IRF QRP questions. The list of help desk and the type of help each help desk provides is provided in #5 below. 6) Professional and industry associations often share this information in newsletters, e-mails and at conferences.

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4.	IRF QRP Help Desks	Where can I find contact information for the various IRF Quality Reporting Program Help Desks?	<p>Here is a list of the IRF Quality Reporting Program and other IRF help desks:</p> <p>IRF Quality Reporting Program (QRP) Email: IRF.questions@cms.hhs.gov Examples of issues this help desk can help you with:</p> <ul style="list-style-type: none"> • IRF Quality Reporting Program requirements, including data submission timelines • IRF-PAI Quality Indicator items (Section B: Communication, Section C: Brief Interview for Mental Status, Section GG: Functional Status, Section H: Bladder and Bowel Continence, Section J: Falls, Section K: Swallowing, Section M: Pressure ulcer coding, Section O: Patient Influenza Vaccine. • Claims-based quality measures (All-Cause Unplanned Readmission Measure for 30 Days Post-Discharge, Potentially Preventable Readmissions – Within Stay; Potentially Preventable Readmissions Post-Discharge; Discharge to Community; Medicare Spending per Beneficiary) • IRF QRP provider training materials • General IRF quality reporting questions <p>CDC/NHSN Email: NHSN@cdc.gov Examples of issues this help desk can help you with:</p> <ul style="list-style-type: none"> • CDC Quality Measures: Catheter-Associated Urinary Tract Infections (CAUTI), Methicillin-resistant <i>Staphylococcus aureus</i> (MRSA) Bacteremia, <i>Clostridium Difficile</i> Infection (CDI), and Influenza Vaccination Coverage among Healthcare Personnel • National Healthcare Safety Network (NHSN) enrollment, reporting, and data analysis <p>Data Submission and Data Validation Email: help@qtso.com Phone: 1-800-339-9313 Examples of issues this help desk can help you with:</p> <ul style="list-style-type: none"> • Accessing QIES (username and password) • Data/record submissions • CMG Grouper classification • Submission/validation reports • Accessing CASPER reports • jIRVEN

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5.	IRF QRP Data Submission Deadlines	What are the data submission deadlines for the IRF Quality Reporting Program?	<p>Data submission deadlines for the IRF QRP quality measures can be found at: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Data-Submission-Deadlines.html</p> <p>IRF-PAI data are submitted to CMS based on deadlines established for the IRF Prospective Payment System. If corrections to the Quality Indicator data need to be made, data must be submitted for the IRF QRP prior to the IRF QRP submission deadlines.</p>
6.	Completion of v. 1.4 IRF-PAI	When do we start using IRF-PAI version 1.4?	Version 1.4 of the IRF-PAI is to be completed for any patient discharged on or after October 1, 2016.
7.	IRF QRP Data Submission Deadlines – Definition of “Quarter”	Does the definition of “quarter” for the quarterly IRF-PAI data submission deadlines for the IRF Quality Reporting Program include patients admitted during that quarter or discharged during that quarter, or both?	<p>For the IRF-PAI, the quarterly data submission deadlines apply to patients with a <i>discharge date</i> that occurs within that quarter, irrespective of admission date. For example, if a patient was admitted on March 30th (Quarter 1: January 1st - March 31st) and discharged on April 16th (Quarter 2: April 1st - June 30th), then the 2nd quarter data submission deadline (Nov 15th) would apply for that patient’s IRF-PAI record.</p> <p>Data submission deadlines are provided on the following website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Data-Submission-Deadlines.html</p>
8.	Correction Deadlines	<p>For the IRF-PAI Quality Indicator items, we noticed that there are data collection timeframes as well as data submission timeframes. We are required to report the data with each submission of the IRF-PAI – so why do we have additional quarterly deadlines?</p> <p>If we submit the information with each IRF-PAI, do we have additional steps to take to submit the data for the IRF QRP? Is that a separate required data submission? If so, how do we submit that data?</p>	IRF-PAI records, which include the Quality indicator data, are submitted to CMS per IRF Prospective Payment System requirements and deadlines. Once you successfully submit the data on the IRF-PAI record, there is no additional data that needs to be submitted for this quality measure, unless you have corrections. The quarterly data submission deadlines are for the IRF QRP and refer to the deadline for making corrections to IRF-PAI data already submitted.

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9.	Mandatory and Voluntary Items	Where can I find the list of mandatory and voluntary items for IRF-PAI Version 1.4?	<p>The list of IRF-PAI Version 1.4 mandatory and voluntary items for the IRF QRP can be found on the following web site: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Program-Measures-Information-.html</p> <p>In the download section of this web site, look for Section 9 of the IRF-PAI Training Manual effective October 1, 2016 to locate mandatory and voluntary items.</p>
10.	Mandatory and Voluntary Items	What is the objective for including voluntary information in IRF-PAI if it is inconsistently reported by all IRFs?	While CMS does not require IRF staff to provide responses to voluntary items, CMS strongly encourages providers to complete these items. The data obtained from responses to the voluntary items will provide CMS with valuable information (e.g., Stage 1 pressure ulcers, healed pressure ulcers) that has not previously been available to us.
11.	3-Day Assessment	What is the definition of a 3-day assessment?	<p>Definition of 3-day assessment period:</p> <p>The 3-day assessment period is three calendar days and is defined in the IRF-PAI Manual. The 3-day assessment period for the IRF-PAI admission assessment includes the first day of admission and the following two days, ending at 23:59. The discharge assessment period encompasses the day of discharge and the two calendar days prior to the day of discharge.</p>
12.	Training videos	Do you have training videos?	<p>Training materials, including links to the videos of the 2016 training sessions are available on the IRF QRP Training web page: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/Training.html</p> <p>Also included in the download section is the IMPACT Act and Assessment Data Element Standardization and Interoperability presentation. Click HERE to access the video.</p>
13.	Public Reporting	When will quality measure data be available on your website where we can view and compare ourselves to other IRFs or a CMS benchmark?	<p>The FY 2016 IRF PPS Final Rule (<i>Federal Register</i> Vol. 80; pages 47080 through 47128) describes plans for future IRF QRP public reporting. In the final rule, CMS finalized a policy to display performance information regarding the quality measures, pending final data analysis, in fall 2016 on a CMS Web site. Facilities will have a 30-day preview period prior to public display of the measures... Additional information about the preview report content and delivery is available on the IRF QRP Web site.</p> <p>The initial display of information will contain IRF provider performance on the following 3 quality measures:</p> <ul style="list-style-type: none"> • <i>Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened (Short-Stay)</i> (NQF #0678) • <i>NHSN CAUTI Outcome Measure</i> (NQF #0138) • <i>All-Cause Unplanned Readmission Measure for 30 Days Post Discharge From IRFs</i> (NQF #2502)