Skilled Nursing Facility (SNF) Value-Based Purchasing (VBP) Program Fiscal Year (FY) 2018 Final Rule

Thursday, November 16, 2017

Presenter:

Celeste Bostic
CMS/CCSQ/QMVIG/DVIQR
## Acronyms in this Presentation

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tr>
<td>CASPER</td>
<td>Certification and Survey Provider Enhanced Reporting</td>
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<td>QIES</td>
<td>Quality Improvement Evaluation System</td>
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<td>Protecting Access to Medicare Act of 2014</td>
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<td>Prospective Payment System</td>
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<td>RSRR</td>
<td>Risk-Standardized Readmission Rate</td>
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<td>SNFRM</td>
<td>Skilled Nursing Facility Readmission Measure</td>
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<td>SNF VBP</td>
<td>Skilled Nursing Facility Value-Based Purchasing Program</td>
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Celeste Bostic, MIM, RN, BSN
Program Lead, SNF VBP
DVIQR, QMVIG, CCSQ, CMS
### Agenda

<table>
<thead>
<tr>
<th>Topic</th>
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<tbody>
<tr>
<td>Overview of the SNF VBP Program</td>
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<tr>
<td>SNF 30-Day All-Cause Readmission Measure</td>
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<tr>
<td>Performance Scoring</td>
</tr>
<tr>
<td>Exchange Function</td>
</tr>
<tr>
<td>Confidential Quarterly Feedback Reports</td>
</tr>
<tr>
<td>Review and Corrections Process</td>
</tr>
<tr>
<td>Public Reporting</td>
</tr>
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<td>Future Communication Activities</td>
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<tr>
<td>Question and Answer Session</td>
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<td>Resources</td>
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Key Objectives

Participants will:

• Understand when the SNF VBP Program will affect Medicare’s payments to SNFs
• Review the SNF 30 Day All-Cause Readmission Measure (SNFRM)
• Understand when the SNF VBP Program’s performance periods and baseline periods will transition from calendar year (CY) to fiscal year (FY)
• Learn about the exchange function CMS will use to translate SNF performance scores into incentive multipliers
• Understand when interim quarterly confidential feedback reports will be disseminated to SNFs
• Understand the Review and Corrections Process
• Learn about future SNF VBP communication activities
CMS Strategic Goals

• The Centers for Medicare and Medicaid Services (CMS) Strategy is built on one main goal: **Put People First**

• CMS will achieve its main goal by meeting four strategic goals:

1. Empower patients and doctors to make decisions about their healthcare
2. Usher in a new era of state flexibility and local leadership
3. Support innovative approaches to improve quality, accessibility, and affordability
4. Improve the CMS customer experience
Overview of the SNF VBP Program
What is the Skilled Nursing Facility Value-Based Purchasing Program?

- The Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program offers Medicare incentive payments to SNFs paid under the SNF Prospective Payment System (PPS) based on their performance on specified measures of readmissions
  - Provides strong incentives for facilities to coordinate care
  - Aims to protect patients from potential harms or adverse events associated with hospital readmissions
- Builds on previous quality improvement efforts in the skilled nursing facility sector and other Medicare VBP Programs
  - *Nursing Home Compare*
  - SNF Quality Reporting Program
Legislative Basis for the SNF VBP Program

Section 215 of the “Protecting Access to Medicare Act of 2014” (PAMA), enacted on April 1, 2014, added subsections (g) and (h) to Section 1888 of the Social Security Act.

Program requirements include:

• A focus on measures of readmissions
• Performance standards for achievement and improvement
• SNF Performance Scores publicly ranked from low to high
• 2% of SNFs’ Medicare payments withheld to fund incentive payments
• Incentive payments totaling 50-70% of the amount withheld from SNFs’ payments
• The bottom 40% of SNFs must receive less in incentive payments than they would otherwise receive
• Confidential and public reporting
FY 2018 SNF PPS Final Rule Overview

• **Beginning October 1, 2018,** eligible SNFs will be awarded value-based incentive payments for the quality of care they give to people with Medicare

• Finalized SNF VBP policies include:
  • Performance and baseline periods for the FY 2020 Program year
  • A revised rounding policy for SNF performance scores
  • A logistic exchange function for use in translating SNF performance scores to incentive multipliers
  • 60% of the total amount withheld from SNFs’ Medicare payments for that FY will be paid as incentive payments to SNFs based on their performance in the program
  • Phase two of the Review and Correction process
  • Public reporting and performance ranking of SNFs’ performance
## Upcoming Program Dates and Periods

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<td><strong>OCT 1</strong>&lt;br&gt;FY 20 Performance Period Begins</td>
<td><strong>DEC 31</strong>&lt;br&gt;FY 19 Performance Period Ends</td>
<td><strong>MAR 31</strong>&lt;br&gt;Phase One Review and Corrections Period Ends</td>
<td><strong>AUG 1-31</strong>&lt;br&gt;Phase Two Review and Corrections Period</td>
<td><strong>OCT 1</strong>&lt;br&gt;Incentive Payments Begin</td>
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**Key for Confidential Quarterly Reporting and Public Reporting**
- ✔ Confidential Quarterly Reporting
- ☑ Public Reporting
## CY to FY Transition

For the FY 2020 Program, performance period and baseline periods for performance scoring will transition to FY periods.

<table>
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<tr>
<th>Term</th>
<th>FY 2019 Program</th>
<th>FY 2020 Program</th>
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<td>Performance Period</td>
<td>Calendar Year (CY) 2017 (Jan 1, 2017-Dec 31, 2017)</td>
<td>FY 2018 (Oct 1, 2017-Sep 30, 2018)</td>
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</table>

**Note:** During the transition, SNFs will be measured on their performance for Q4 of 2017 (Oct 1, 2017 through Dec 31, 2017) for both program years.
SNF 30-Day All Cause Readmission Measure (SNFRM)
SNF 30-Day All Cause Readmission Measure (SNFRM): Overview

The SNFRM estimates risk-standardized rate of all-cause, unplanned hospital readmissions of Medicare SNF beneficiaries within 30 days of discharge from their prior proximal acute hospitalization.

- Lower readmission rates are better
- Hospital readmissions are identified through Medicare claims
- Readmissions within 30-day window are counted regardless of whether the beneficiary is readmitted to the hospital directly from the SNF or has been discharged from the SNF
- Risk-adjusted based on patient demographics, principal diagnosis in prior hospitalization, comorbidities, and other health status variables that affect probability of readmission
- Excludes planned readmissions since these are not indicative of poor quality
- The SNFRM is endorsed by the National Quality Forum (NQF #2510)

Note: The measure used in the SNF VBP Program is not the same as the readmission measure posted on the Nursing Home Compare website and not the same as the measure adopted for the SNF Quality Reporting Program.
Performance Scoring
SNF VBP Performance Score: Overview

- SNFs are assigned SNF VBP Performance Scores based on their SNFRM RSRRs in the applicable baseline and performance periods
- SNF VBP Performance Scores range from 0 to 100 points
- SNFs are assigned values for both their improvement from the baseline year to the performance year and their achievement in the performance period using the equations outlined in the FY 2017 SNF PPS Final Rule
- The performance score is the higher of a SNF’s achievement score or improvement score
- For SNFs that only have performance period data, the achievement score will equal the performance score
Calculating a SNF VBP Performance Score: Inverting the SNFRM

Since lower RSRRs are better, SNF VBP performance scores will be calculated under the SNF VBP Program by first inverting SNFRM rates using the following calculation:

\[ \text{SNFRM Inverted Rate} = 1 - \text{Facility’s SNFRM Rate} \]

**Example**: SNF RSRR of 20.449%

\[
\begin{align*}
\text{SNFRM Inverted Rate} &= 1 - 0.20449 \\
\text{SNFRM Inverted Rate} &= 0.79551
\end{align*}
\]

Once the RSRR has been inverted, a higher score is better.

**Note**: SNF performance scores will be rounded to the fifth significant digit.
Calculating a SNF VBP Performance Score: Achievement and Improvement

**Achievement Score**: Points awarded by comparing the facility’s rate during the performance period (CY 2017) with the performance of **all facilities nationally** during the baseline period (CY 2015).
- Rate better than or equal to benchmark: 100 points
- Rate worse than achievement threshold: 0 points
- Rate between the two: 1 – 99 points, awarded according to the formula described in the final rule

**Improvement Score**: Points awarded by comparing the facility’s rate during the performance period (CY 2017) with its previous performance during the baseline period (CY 2015).
- Rate better than or equal to benchmark: 90 points
- Rate worse than improvement threshold: 0 points
- Rate between the two: 1 – 89 points, awarded according to the formula described in the final rule

**The SNF VBP Performance Score is the higher of the Achievement and Improvement Scores.**
Exchange Function
What is an Exchange Function?

- An exchange function is a mathematical model that matches performance scores to incentive multipliers that are added to Medicare payments.

- An exchange function is used to ensure that the incentive multipliers awarded to all SNFs provide a specific total amount of incentive payments.
Exchange Function Background

- There are two steps required by statute which bring up the need for an exchange function:
  - CMS must reduce SNFs’ Medicare payments by two percentage points, then
  - distribute incentive payments to all SNFs based on their quality performance, but not more than 50-70% of the total reduction
- CMS finalized a payback percentage of 60% of the amount withheld from SNFs’ Medicare claims
- The exchange function ensures that the incentive payments paid to SNFs do not exceed the finalized payback percentage
  - SNFs’ multipliers depend on the distribution of all other SNFs’ performance scores
- CMS finalized a logistic exchange function, or S-shaped curve, as the exchange function that will be used to translate SNF performance scores into incentive multipliers
Logistic Exchange Function

\[ y = \frac{1}{1 + e^{-0.1(x - 50)}} \]

**Note:** This equation is used to compute the function's form, **not** to calculate incentive payments directly from a SNF performance score.
Calculating the Exchange Function: Overview

• In order to calculate the exchange function, we must have both baseline period and performance period quality measure data for all SNFs, as well as the total payments.

• As discussed in the FY 2018 SNF PPS rule, we will take the following steps to calculate the exchange function after computing SNF performance scores:
  1. Estimate Medicare spending on SNF services for the FY 2019 payment year;
  2. Estimate the total amount of reductions to SNFs’ adjusted Federal per diem rates for that year, as required by statute;
  3. Calculate the amount realized under the payback percentage policy (i.e., 60%);
  4. Order SNFs by their SNF performance scores; and
  5. Assign an incentive multiplier to each SNF that corresponds to the point on the logistic function that corresponds to its SNF performance score.
Calculating the Exchange Function: Step 1

• Estimate Medicare spending on SNF services for the FY 2019 payment year

  • We construct a payment file based on a historical time period. This payment file contains all SNFs’ Medicare spending for the year in question – such as CY 2016

  • The payment file is based on SNFs’ adjusted Federal per diem rates, as required by statute

  • It is not possible to calculate the exchange function without spending estimates for all 15,000+ SNFs
Calculating the Exchange Function: Step 2

• Estimate the total amount of reductions to SNFs’ adjusted Federal per diem rates for that year, as required by statute

  • We then estimate the pool of funds that we may use for incentive payments by summing SNFs’ adjusted Federal per diem rates, then multiplying that result by 2%

  • For example, if we estimate that the total adjusted Federal per diem rates for a given year are $25 billion...
    • $25 billion * 2% = $500 million
    • The total pool of reductions to SNFs’ Medicare payments would be $500 million
Calculating the Exchange Function: Step 3

• Calculate the amount realized under the payback percentage policy (i.e., 60%)

  • We then multiply the total amount of reductions to SNFs’ Medicare payments by the finalized payback percentage

  • Example, continued:
    • $500 million \times 60\% = $300\ million
    • In this example, we estimate that the total amount of incentive payments may not exceed $300 million
Calculating the Exchange Function: Step 4

• Order SNFs by their SNF performance scores
  • We place SNFs in order of their SNF performance scores from lowest to highest
Calculating the Exchange Function: Step 5

• Assign an incentive multiplier to each SNF that corresponds to the point on the logistic function that corresponds to its SNF performance score

• Using a computer program, we assign an incentive multiplier to each SNF that reflects its SNF performance score and accounts for the total Medicare spending that we are allowed by statute to modify
Calculating the Exchange Function: Step 5 (cont’d)

Note: This is an example to show hypothetical SNF performance scores and incentive multipliers.
Performance Scoring and Exchange Function Milestones (CY 2018)

- Jan-May: Claims processing begins
- May-Jul: SNFRM analytic file is built and RSRRs are calculated
- Jul: SNF VBP performance scores and payment adjustments are calculated
- Aug: SNFs receive annual measure performance score reports
- Sep: Incentive multipliers are sent to PPS to be applied to claims
- Oct: Incentive payments are paid to SNFs
Quarterly Confidential Feedback Reports
Quarterly Confidential Feedback Reports: Overview

- Section 1888(g)(5) of the Social Security Act requires CMS to provide quarterly confidential feedback reports to SNFs on their performance on the measures specified for the Program.

- Quarterly confidential feedback reports are disseminated to SNFs via the Quality Improvement Evaluation System (QIES) and the CASPER reporting application. To obtain access to the CASPER reporting application, please contact the QTSO Helpdesk at help@qtso.com.

![The Skilled Nursing Facility Value-Based Purchasing Program Quarterly Confidential Feedback Report](image)

**Source:** Medicare claims and eligibility data from CY 2014.
Interim Quarterly Reports

• Beginning December 2017, CMS will provide SNFs with a snap-shot of their patients’ stay-level data for the first quarter of CY 2017

• These interim quarterly reports are intended to provide SNFs with a first look at their readmissions data for a portion of the performance period

• These reports contain the following data elements for each qualifying SNF-stay:
  • HICN, Sex, Age
  • Admission Date, Discharge Date and Discharge Status Code for the Index SNF Stay
  • CCN, Admission Date, Discharge Date and Principle Diagnosis for the Prior Proximal Hospital Stay
  • Whether the stay resulted in a planned or unplanned hospital readmission
  • CCN, Admission Date, Discharge Date and Principal Diagnosis for the Readmission Hospital, if applicable

• An interim quarterly report will also be provided in March 2018 and June 2018

Note: The data contained in the interim quarterly reports are not final and are subject to change
Review and Corrections Process
Phase 1 Review and Corrections

• Limited to review and correction of SNF’s RSRR

1. Submit request to SNFVBPInquiries@cms.hhs.gov mailbox

2. Correction requests to the contents of any quarterly report will be accepted until March 31 following the report’s delivery

3. CMS will review the request and notify the requesting SNF of the final decision
Annual Performance Score Report: Preview

To fulfill statutory requirements, CMS will provide SNFs with an annual confidential feedback report containing the performance information that will be made public.

<table>
<thead>
<tr>
<th>Potential Annual Performance Score Report Elements</th>
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<tbody>
<tr>
<td>Baseline Period RSRR</td>
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<tr>
<td>Performance Period RSRR</td>
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<td>SNF Performance Score</td>
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<td>SNF Ranking</td>
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<tr>
<td>Incentive Payment Percentage</td>
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</table>
Phase 2 Review and Corrections

• Limited to SNFS’ performance scores and ranking

Submit request to SNFVBPinquiries@cms.hhs.gov mailbox

Corrections must be made to the SNF performance score report and within 30 days of their posting.

CMS will review the request and notify the requesting SNF of the final decision
Public Reporting
Nursing Home Compare—CY 2015 SNFRM Data Available

• In October 2017, SNF performance data from the baseline year of the SNF VBP Program, SNFRM rates for CY 2015, was published on Nursing Home Compare.
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<th>SNF VBP Ranking</th>
<th>Provider Number (CCN)</th>
<th>Skilled Nursing Facility Name</th>
<th>Address</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
<th>County</th>
<th>Baseline Period: CY 2015 Risk-Standardized Readmission Rate (%)</th>
<th>Performance Period: CY 2017 Risk-Standardized Readmission Rate (%)</th>
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**CMS Medicare Learning Network**
Public Reporting: Preview

After August 1, 2018, SNF performance rankings will be posted on Nursing Home Compare and QualityNet and will include the following elements:

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<th>SNF VBP Public Reporting Elements</th>
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Future Communications Activities
SNF VBP Communication Channels

• Stay tuned for future SNF VBP information via the following communication channels:
  • Medicare Learning Network (MLN)
  • Twitter
  • SNF VBP Webpage on CMS.gov
  • SNF VBP Webpage on QualityNet.Org
Question & Answer Session
Resources

- SNF PPS FY 18 Final Rule
- SNF VBP Webpage
- Nursing Home Compare
- Quality Net
- Twitter

If you have additional questions, please email them to: SNFVBPinquiries@cms.hhs.gov
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