

# **Special Open Door Forum**

**Update on the CMS Quality Reporting  
Program for  
Inpatient Rehabilitation Facilities\***

**Thursday, August 16, 2012**

**1:00 p.m. – 2:30 p.m. (ET)**

**\*Patient Protection and Affordable Care Act, Section 3004(a)**

# Goals of this Special Open Door Forum

By the end of this Open Door Forum, participants will be able to:

- Understand the requirements of the IRF quality reporting program (Section 3004 of the Affordable Care Act)
- Understand how to successfully submit accurate data and avoid penalties
- Describe resources available for assistance with the ACA Section 3004 IRF Quality Reporting Program

# Legislative Mandate

- Section 3004 of the Patient Protection and Affordable Care Act (PPACA), was passed in March, 2010
- For rate year 2014, and each subsequent year thereafter, failure to submit required quality data to CMS shall result in a 2 percentage point reduction to the annual increase factor for payments made for discharges occurring during that fiscal year

# Quality Measures

IRFs must begin to submit their quality measure data on October 1, 2012 for the following quality measures:

- New or Worsened Pressure Ulcers
- Catheter-Associated Urinary Tract Infections (CAUTIs)

# Quality Measure- New or Worsening Pressure Ulcers

# Changes to the IRF-PAI

- A new version of the IRF-PAI will be used for patients discharge on and after October 1, 2012.
- The updated IRF-PAI has new pressure ulcer items (48A through 50D)
- Failure to complete these new pressure ulcer items (items 48A through 50D) starting on and after October 1, 2012, will result in payment reduction of two percentage points starting in Fiscal Year 2014.

# New IRF-PAI Pressure Ulcer Items

## Pressure Ulcers

Current Number of Unhealed (non-epithelialized) Pressure Ulcers at Each Stage.

48A. Stage 2: Partial thickness loss of dermis presenting as a shallow open ulcer with a red or pink wound bed, without slough. May also present as an intact or open/ruptured blister.

Number of Stage 2 pressure ulcers                        
Admission Discharge

48B. Stage 3: Full thickness tissue loss. Subcutaneous fat may be visible but bone, tendon or muscle is not exposed. Slough may be present but does not obscure the depth of tissue loss. May include undermining and tunneling.

Number of Stage 3 pressure ulcers                        
Admission Discharge

48C. Stage 4: Full thickness tissue loss with exposed bone, tendon or muscle. Slough or eschar may be present on some parts of the wound bed. Often includes undermining and tunneling.

Number of Stage 4 pressure ulcers                        
Admission Discharge

# New IRF-PAI Pressure Ulcer Items

## Worsening in Pressure Ulcer Status Since Admission

Indicate the number of current pressure ulcers that were not present or were at a lesser stage at admission. If no current pressure ulcer at a given stage, enter 0.

49A. Stage 2. Enter Number: \_\_\_\_\_

49B. Stage 3. Enter Number: \_\_\_\_\_

49C. Stage 4. Enter Number: \_\_\_\_\_

## Healed Pressure Ulcers.

50A. Were pressure ulcers present on admission? \_\_\_\_\_  
(0 – No; 1 – Yes)

Indicate the number of pressure ulcers that were noted on admission that have completely closed (resurfaced with epithelium). If no healed pressure ulcer at a given stage since admission, enter 0.

(Code only if item 50A is 1 – yes)

50B. Stage 2 Enter Number \_\_\_\_\_

50C. Stage 3 Enter Number \_\_\_\_\_

50D. Stage 4 Enter Number \_\_\_\_\_

# Some Frequently Asked Questions: IRF Quality Reporting Program

# Rehabilitation Units

**Question:** Do rehabilitation units within acute care hospitals need to participate in the IRF Quality Reporting Program?

**Answer:** An inpatient rehabilitation facility located within an acute care hospital needs to submit the pressure ulcer and CAUTI data in order to avoid the 2% penalty.

A unit that is an inpatient rehabilitation facility has its own CCN (CMS Certification Number), and **will have a “T” or an “R” in the third position of the CCN.** If you do not know your CCN, contact your hospital billing department.

# Freestanding Hospitals

**Question:** How can a freestanding hospital determine if they are an inpatient rehabilitation facility?

**Answer:** If the last four digits of your CCN (CMS Certification Number) are between 3025 and 3099, then your freestanding facility is an IRF. As an IRF you must submit pressure ulcer and CAUTI data or face the 2% penalty. If you do not know your CCN, contact your facility's billing department to obtain it.

# Some Frequently Asked Questions: Pressure Ulcers and IRF-PAI Data Submission

# Pressure Ulcer Staging

**Question:** What types of clinical personnel can stage pressure ulcers and report the pressure ulcer items on the IRF-PAI?

**Answer:** Patient assessments are to be done in compliance with facility, State and Federal requirements. State laws provide guidance on who may complete assessments of patients.

# Reporting No Pressure Ulcers

**Question:** If a patient is admitted with no pressure ulcers, and is discharged with no pressure ulcers, how should the facility fill out IRF-PAI Pressure Ulcer Items 48 through 50?

**Answer:** If a patient has zero pressure ulcers at admission and discharge, then report “0” (zero) for items 48A through 50A. Do not leave these items, 48A-50A, blank.

# Unexpected Discharge

**Question:** If a patient is discharged unexpectedly before the staff has had a chance to perform a full skin assessment, how should items 48 through 50 be completed?

**Answer:** If a full skin assessment was NOT completed, a “-” (dash) can be reported for items 48 through 50 at admission or discharge.

# Admission Assessment

**Question:** A patient is admitted to an IRF with no pressure ulcers, and the admission assessment is completed indicating “0” pressure ulcers. By Day 3, a Stage 2 pressure ulcer has developed. Can the facility change Item 48A. Number of Stage 2 Pressure Ulcers present on Admission from “0” to “1”?

**Answer:** No. The admission assessment should be completed as close to the time of admission as possible, and reflect the patient’s condition at the time of admission. Therefore, item 48A will be “0” (zero) on the admission.

# Admission Assessment

**Question:** A patient is admitted to an IRF with no pressure ulcers. This is documented in the medical record, but the IRF-PAI is not completed. By Day 3, a Stage 2 pressure ulcer has developed. Can the facility code Item 48A. Number of Stage 2 Pressure Ulcers present on admission as “1” when the IRF-PAI is completed?

**Answer:** No. Report data based on the admission assessment done as close to the time of admission as possible. Therefore, item 48A will be “0” (zero) on the admission.

# Pressure Ulcer Data Submission

- Updated IRF-PAI assessment collection software (jIRVEN) will be available from CMS to support the 10/01/2012 release.
- Release Date for jIRVEN is the week of August 27
- Same IRF-PAI submission process will be used.

# Quality Measure—CAUTI

# CDC NHSN Data Submission

## **CAUTI Data:**

- Submitted on-line to the Centers for Disease Control (CDC) via the NHSN (National Health Safety Network)
- Registration, training, a signed agreement is required

# CDC Data Submission

- For the IRF QRP, IRFs with a CCN with the last 4 digits of 3025-3099 need to register with CDC as a “Rehabilitation Facility”
  - **A signed Agreement to Participate and Consent is needed with the CDC in order to share your information with CMS**
- For IRFs with CCN with “T” or “R” in 3<sup>rd</sup> position, will be identified as a location within an acute care facility
- For questions about NHSN enrollment of your IRF contact CDC at [NHSN@cdc.gov](mailto:NHSN@cdc.gov)

## **Before you begin the enrollment process:**

- Know your facility's CCN ID.
- Read CDC NHSN Urinary tract infection diagnostic criteria
- Read Technical and legal requirements for the NHSN

If Your Facility is NOT registered  
with CDC NHSN: What to Do ?

# NHSN Enrollment/Registration

- If you determine that your facility is not already enrolled within NHSN:
  - Appoint a person from your facility as the NHSN Facility Administrator to enroll the facility in NHSN
  - Complete the online training
  - Enroll in NHSN
  - Register with NHSN
    - Apply for a CDC Digital Certificate
    - Enroll in NHSN by completing the necessary contact information and survey forms
    - Print, sign, and return consent form to CDC

# If Your Facility is ALREADY enrolled in CDC NHSN: What to Do

## **Basic Steps if your Facility is already Enrolled in NHSN**

- Complete the online NHSN training
- Determine if the rehabilitation unit has already been added as a location within your NHSN facility
- Follow online directions to appropriately set up your rehab unit to submit data to CMS

# Tips and Hints

- Frequently asked questions about enrollment can be found here:  
[http://www.cdc.gov/nhsn/FAQ\\_enrollment.html](http://www.cdc.gov/nhsn/FAQ_enrollment.html)
- Frequently asked questions about the NHSN in general can be found here:  
[http://www.cdc.gov/nhsn/FAQ\\_general.html](http://www.cdc.gov/nhsn/FAQ_general.html)
- To send questions and/or comments about the NHSN, send an email to: [nhsn@cdc.gov](mailto:nhsn@cdc.gov). Each message will be forwarded to the appropriate person and a response will be sent to you.

# Reporting CAUTIs Using NHSN

# Monthly Reporting

- Complete a monthly summary form indicating the number of indwelling catheter days for the location must be reported, even if that number was zero, using the ICU/Other Denominator form
- If there were no CAUTIs for the month: Check the “Report No Events: CAUTI” box on the Denominator for Intensive Care Unit/Other Locations screen with the NHSN application
- If there is a CAUTI: fill out a Urinary Tract Infection event form for each CAUTI identified in the rehab location(s).

# Data Submission

**Question:** Is the data for the pressure ulcer quality measure submitted via CDC NHSN?

**Answer:** No. For the IRF QRP, the CDC NHSN is only collecting data on CAUTIs. Pressure Ulcer data is sent to CMS on the IRF-PAI, using the IRF-PAI submission processes.



# Pressure Ulcer Data Submission

- Updated IRF-PAI assessment collection software (jIRVEN) will be available from CMS
- Release Date: Week of August 27th
- Same IRF-PAI submission process will be used

# Technical Training

- Inpatient Rehabilitation Validation and Entry system (jIRVEN) is the free CMS software for IRF-PAI
- 4 recorded WebEx training videos will be available the week of August 20<sup>th</sup> that will review key areas of the jIRVEN tool:
  - jIRVEN Login - How to login into the tool & how to add facility and user information
  - jIRVEN Patient/Assessment – How to create patient and assessment information
  - jIRVEN Import/Export – How to import and export assessments.
  - jIRVEN Reports – Review of the reports available within the jIRVEN tool.



# Technical Training

- A demonstration, or training, version of the jIRVEN tool will be available for download the week of August 20<sup>th</sup>
  - For practice and training purposes only
  - Will not allow you to export any of the assessment data
  - Will not allow you to import any data
  - Certain edits will be disabled

# Technical Training

- 2 recorded WebEx training videos will be available the week of September 3<sup>rd</sup> that will review key areas of the Submission System:
  - IRF Assessment Submission Process: How to submit the IRF-PAI to CMS ASAP
    - » CASPER Reports – IRF-PAI Reports: How to access facility validation report and other reports

# Upcoming Open Door Forums

**Thursday September 20, 2012**

1:00 p.m. – 2:30 p.m.

**Thursday October 18, 2012**

1:00 p.m. – 2:30 p.m.

# Help Desks

For Questions about:

- IRF-PAI data coding or IRF-PAI Data submission:  
Phone: 1-800-339-9313 or email:  
[help@qtso.com](mailto:help@qtso.com)
- CAUTI data or submission or NHSN registration:  
Email: [NHSN@cdc.gov](mailto:NHSN@cdc.gov)
- Quality measure calculation, data submission deadlines, the new pressure ulcer items:  
Email: [IRF.questions@cms.hhs.gov](mailto:IRF.questions@cms.hhs.gov)