

SKILLED NURSING FACILITY QUALITY REPORTING PROGRAM (SNF QRP)



# COVID-19 Public Reporting Tip Sheet

## This third edition of the SNF QRP Public Reporting (PR) Tip Sheet:

- Provides the following updates on SNF QRP Public Reporting:
  - Adoption of a new Centers for Disease Control and Prevention (CDC) National Healthcare Safety Network (NHSN) measure, Influenza Vaccination Coverage among Healthcare Personnel (National Quality Forum (NQF) #0431), beginning with the Fiscal Year (FY) 2024 SNF QRP.
  - Inaugural reporting of the COVID-19 Vaccination Coverage among Healthcare Personnel (HCP), reported through CDC NHSN, and SNF Healthcare Associated-Infections (HAI) Requiring Hospitalization claims-based quality measures (QMs).
  - Definition of the quarters for reporting of claims-based QMs displayed on Care Compare and the Provider Data Catalog (PDC).
- Discusses the revised data submission threshold related to the SNF QRP annual payment update (APU).



To understand the background of the SNF QRP in relation to the COVID-19 Public Health Emergency (PHE), please refer to the [Second Edition SNF COVID-19 PR Tip Sheet](#) published in February 2022. This previous tip sheet provided information about CMS' plan to adjust public reporting due to the Calendar Year (CY) 2020 COVID-19 exempted data (Q1 and Q2 2020). The temporary exceptions to the SNF data submission requirements, which ended on June 30, 2020, were a result of the COVID-19 PHE. The resumption of public reporting on Care Compare and the PDC for the Minimum Data Set (MDS) assessment-based QMs with the April 2022 refresh cycle was also explained in this tip sheet. In addition, the plan for the resumption of public reporting for claims-based measures during the July 2022 refresh was outlined, and the inaugural reporting of the new CDC NHSN measure, COVID-19 Vaccination Coverage among HCP, was explained.

### Document Terms

**CY 2020 COVID-19 Exempted Data:** Refers to exempted quarters, Q1 and Q2 2020, of data due to the COVID-19 PHE.

**Normal Refresh:** Refers to updates on Care Compare using the standard number of consecutive quarters of data.

## SNF QRP QMs

### New QM Finalized for the SNF QRP

As finalized in the SNF Prospective Payment System (PPS) FY 2023 Final Rule, the SNF QRP is adopting the CDC-developed Influenza Vaccination Coverage among HCP (NQF #0431) measure for the FY 2024 SNF QRP. This measure is currently used in the Long-Term Care Hospital (LTCH) and Inpatient Rehabilitation Facility (IRF) PAC QRPs and will be collected through CDC's NHSN HCP influenza data reporting module. Data collection for this measure began on October 1, 2022. Inaugural reporting of this measure will occur with the October 2023 Care Compare refresh using data collected during this year's influenza season (October 1, 2022, through March 31, 2023); the July 2023 Provider Preview Report will include the provider's performance rate on this measure. Thereafter, measure rates will be displayed based on six months of data, reflecting the reporting period of October 1 through March 31, and updated annually.

This process measure will report the percentage of HCP who received the influenza vaccine. CMS has included this measure to encourage HCP to receive the influenza vaccine to reduce cases, hospitalizations, and lower mortality rates associated with the influenza virus.

For additional details about this measure, please refer to the SNF PPS FY 2023 Final Rule at the link under *Resources* below. For a list of all QMs used in the SNF QRP, please refer to the [SNF QRP Measures and Technical Information](#) web page.

## Public Reporting and Care Compare

### Inaugural Public Reporting for the SNF HAI Requiring Hospitalization and COVID-19 Vaccination Coverage among HCP Measures

**SNF HAI Requiring Hospitalization** – The inaugural reporting of this measure occurred during the July 2022 release. This refresh used 1 year of Medicare fee-for-service claims data from Q4 2018–Q3 2019 (October 1, 2018, through September 30, 2019), as this was the most recent FY of data that had not been exempted due to the PHE. Beginning with the FY 2024 SNF QRP, subsequent compliance for the SNF QRP APU reporting requirements will use FY 2021 claims data from Q4 2020–Q3 2021 (October 1, 2020, through September 30, 2021), and advance by one FY with each annual refresh.

**COVID-19 Vaccination Coverage among HCP** – The inaugural display of this measure on Care Compare and the PDC occurred with the October 2022 refresh and is based on one quarter of data, the first being Q4 2021 (October 1, 2021, through December 31, 2021) affecting the CY 2021 reporting period/FY 2023 payment determination. Following this initial release, data will be updated and publicly reported on a quarterly basis. Compliance for the SNF QRP APU reporting requirements will be based on four quarters of data submission each CY, beginning in CY 2022, and affecting FY 2024 payment determination.

### CMS' Approach to Excepted Data for Public Reporting

The Q1 and Q2 2020 COVID-19 excepted data are still impacting what is displayed on Care Compare for the claims-based measures. CMS resumed public reporting on Care Compare and the PDC using four quarters of MDS assessment-based QM data in April 2022.

### When did or will refreshes return to their expected (“normal”) quarters data?

The SNF QRP QM data on Care Compare and PDC returned to displaying its expected quarters of data in April 2022 for MDS assessment-based measures and will return to displaying the expected quarters of data for claims-based measures in October 2023.



**Table 1** provides a summary of the data refreshes for each of the data sources in the SNF QRP. It also provides the dates that are included in the respective quarterly refreshes for measures derived from each of the three data sources. The footnotes provide more detail and definitions.

**Table 1. Summary of Data Refreshes**

Quarter Refresh	MDS Assessment-Based Measures	Claims-Based Measures	CDC NHSN Measures
January 2022	Public reporting resumes using three quarters of data (Q3 2020–Q1 2021) <sup>1</sup>	Freeze	N/A
April 2022	Normal reporting resumes using four quarters of data (Q3 2020–Q2 2021)	Freeze	N/A
July 2022	Normal refresh	Public reporting resumes using six quarters of data (Q3 2019, Q4 2019 and Q3 2020–Q2 2021) Inaugural reporting of SNF HAI Measure using four quarters of data (Q4 2018–Q3 2019) <sup>2</sup>	N/A
October 2022	Normal refresh	No refresh <sup>3</sup>	Inaugural reporting of the COVID-19 Vaccination Coverage among HCP Measure using Q4 2021 data (October 1, 2021–December 31, 2021) <sup>4</sup>
October 2023	Normal refresh <sup>5</sup>	Normal reporting resumes using eight consecutive quarters of data (Q4 2020–Q3 2022) <sup>6</sup>	Normal refresh including the inaugural reporting of the Influenza Vaccination Coverage among HCP Measure using 6 months of data (October 1, 2022–March 31, 2023) <sup>7</sup>

<sup>1</sup> Methodology used for measure calculation for this refresh to account for the missing PHE-excepted data (Q1 and Q2 2020) was detailed in the FY 2022 Final Rule.

<sup>2</sup> From July 2022 through July 2023, refreshes will contain only six quarters of data for all claims-based measures except the SNF HAI Measure which uses four quarters of data.

<sup>3</sup> CMS will not perform the annual update in October 2022. The next update will be October 2023.

<sup>4</sup> Subsequent to this inaugural display, data will be updated and reported quarterly.

<sup>5</sup> Data collection for the Transfer of Health Information assessment-based QMs starts on October 1, 2023, per the SNF PPS FY 2023 Final Rule.

<sup>6</sup> Claims-based measures will fully normalize with the September 2024 refresh as Q1 and Q2 2020 exclusions will no longer be used in the stay constructions/lookback periods.

<sup>7</sup> Subsequent to this inaugural display, reporting will be based on six months of data reflecting the reporting period of October 1 through March 31, updated annually.

## Reporting of Claims-Based Measures

CMS made the decision to delay public reporting by six months to allow more time to analyze the calculation of these measures in consideration of the effect of the excepted data on certain aspects of measure calculation such as look-back periods and risk-adjustment.

CMS resumed public reporting of claims-based measures using six quarters of data in the July 2022 refresh. Because of this recent refresh, CMS will not perform the normal annual update in October 2022, as the data will not change enough to be meaningful. CMS will next update these data during the October 2023 refresh, after which CMS will resume the normal cadence of annual updates.

**Figure 1** below depicts how CMS accommodated the excepted two quarters of data related to the COVID-19 PHE, as well as the resumption of the normal annual refresh in October 2023.

**Figure 1. Quarters Used in Reporting of Claims-Based Measures**

Quarter Refresh	2019				2020				2021				2022			
	Q1	Q2	Q3	Q4												
July 2022 <sup>1</sup>																
October 2022 <sup>1</sup>																
January 2023 <sup>1</sup>																
April 2023 <sup>1</sup>																
July 2023 <sup>1</sup>																
October 2023 <sup>2</sup>																

<sup>1</sup>Per the March 27, 2020, MLN Memo, Q1 and Q2 2020 data will not be publicly reported.  
<sup>2</sup>The darker shaded area displays the eight consecutive quarters of data that will be reflected in the October 2023 refresh. Note that the SNF HAI QM uses only four quarters of data, and in October 2023, will reflect data from Q4 2021–Q3 2022.

## Revised Data Submission Compliance Threshold for the SNF QRP APU

Compliance with timely submission and acceptance of MDS assessment data, beginning with FY 2018 and for all subsequent payment updates, has included meeting a minimum threshold of no less than 80 percent of MDS assessments submitted containing all QMs data and standardized patient assessment data elements required to calculate SNF QRP QMs. With the addition of QM data being submitted to the CDC NHSN, CMS is adding an **additional** minimum threshold requirement to the SNF QRP for QM data collected and submitted using the CDC NHSN. To be compliant with this additional threshold, SNFs must submit 100 percent of the measures data collected to the CDC NHSN that are required to calculate the QMs, beginning with FY 2023 and for all subsequent payment updates. Both thresholds will apply to all measures and standardized patient assessment data requirements adopted into the SNF QRP.

SNFs **must meet or exceed both thresholds** to avoid receiving a two-percentage point (2%) reduction to their APU for a given FY. There are no submission requirements for Medicare claims data outside of the submission of the Medicare bill. Please refer to the SNF PPS FY 2023 Final Rule at the link under *Resources* below for additional information.

## Provider Reports

- **Provider Preview Report (PPR):** The purpose of the PPR is to give providers the opportunity to preview their MDS, claims-based, and NHSN QM results prior to public display on Care Compare and the PDC.
- **Review and Correct (R&C) Report:** The purpose of the R&C report is for providers to access QM data prior to the data correction deadline for public reporting. It includes data from the most current quarter and data from the previous three quarters. The report notes which quarters of data are “open” for correction and which are “closed,” no longer allowing correction.
- **SNF QM Reports:** These reports give providers confidential feedback on the facility’s performance. Providers can run a QM report for any reporting period of their choice; they can include a full year of data if requested. The QM reports can include both facility- and resident-level data.



## Resources

- [First Edition SNF QRP COVID-19 PR Tip Sheet.](#)
- [Second Edition SNF QRP COVID-19 PR Tip Sheet.](#)
- [FY 2023 SNF PPS Final Rule \(CMS-1765-F\) Fact Sheet.](#)
- [FY 2023 SNF PPS Final Rule \(CMS-1765-F\).](#)
- [CMS Medicare Learning Network Memo released March 27, 2020.](#)
- [Program Guidance and Information about the CMS response to COVID-19.](#)
- [SNF QRP Spotlight & Announcements Webpage for Program Guidance, Updates, and Announcements.](#)
- [Public Reporting for the SNF QRP.](#)
- [SNF QRP Quick Reference Guide.](#)
- [FY 2024 SNF QRP Data Collection and Submission Deadlines.](#)

### **Help Desk for Public Reporting of SNF QRP Quality Data:**

[SNFQRPPRQuestions@cms.hhs.gov](mailto:SNFQRPPRQuestions@cms.hhs.gov)

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