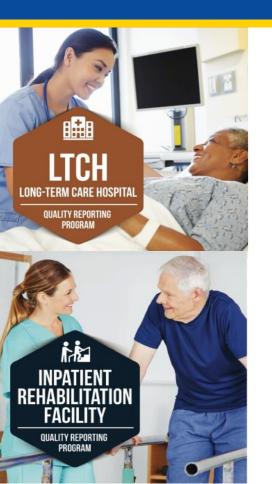


Quality Reporting Program Provider Training



Section N: Medications

Terry Kahlert Eng, RTI International August 29, 2018

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- Training materials can be downloaded from:
 - LTCH Quality Reporting Training page:
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 - IRF Quality Reporting Training page:
 https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Training.html
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Today's Presenter



Terry Kahlert Eng, Ph.D., R.N. Research Public Health Analyst RTI International



Acronyms in This Presentation

- Centers for Medicare & Medicaid Services (CMS)
- Drug Regimen Review (DRR)
- Improving Medicare Post-Acute Care Transformation Act (IMPACT Act)
- Inpatient Rehabilitation Facility (IRF)
- Inpatient Rehabilitation Facility-Patient Assessment Instrument (IRF-PAI)
- International Normalized Ratio (INR)





Acronyms in This Presentation (cont.)

- Long-Term Care Hospital (LTCH)
- LTCH Continuity Assessment Record and Evaluation (LTCH CARE) Data Set
- Medication Administration Record (MAR)
- Post-Acute Care (PAC)
- Registered Nurse (RN)
- Total Parenteral Nutrition (TPN)





Overview

- Define the new Section N: Medications
- Explain the intent of Section N
- Explain new items added to the Long-Term Care Hospital (LTCH)
 Continuity Assessment Record and Evaluation (CARE) Data Set v4.00 and
 Inpatient Rehabilitation Facility-Patient Assessment Instrument (IRF-PAI)
 v2.0
- Discuss coding instructions for items
- Provide practice coding scenarios
- Explain how the Drug Regimen Review (DRR) quality measure is calculated



Objectives

State the intent of Section N

Articulate the purpose of the new items and coding options

Apply coding instructions to accurately code practice scenarios



Describe the new DRR quality measure





Section N: Medications

New Section in LTCH CARE Data Set v4.00 and IRF-PAI v2.0





Drug Regimen Review Conducted With Follow-Up for Identified Issues

128 STAT. 1952 PUBLIC LAW 113-185-OCT. 6, 2014

> Public Law 113-185 113th Congress

Oct. 6 2014 [H.R. 4994] To amend title XVIII of the Social Security Act to provide for standardized post acute care assessment data for quality, payment, and discharge planning, and

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, Improving Medicare Post-Acute Care Transformation

This Act may be cited as the "Improving Medicare Post-Acute Care Transformation Act of 2014" or the "IMPACT Act of 2014".

SEC. 2. STANDARDIZATION OF POST-ACUTE CARE DATA.

(a) IN GENERAL.—Title XVIII of the Social Security Act is amended by adding at the end the following new section:

DATA FOR QUALITY, PAYMENT, AND DISCHARGE PLAN-

"(a) REQUIREMENT FOR STANDARDIZED ASSESSMENT DATA .-"(1) IN GENERAL.—The Secretary shall—

"(A) require under the applicable reporting provisions post-acute care providers (as defined in paragraph (2)(A))

"(i) standardized patient assessment data in accordance with subsection (b);

"(ii) data on quality measures under subsection (c)(1); and

"(iii) data on resource use and other measures under subsection (d)(1);

"(B) require data described in subparagraph (A) to be standardized and interoperable so as to allow for the exchange of such data among such post-acute care providers and other providers and the use by such providers of such data that has been so exchanged, including by using common standards and definitions, in order to provide access to longitudinal information for such providers to facilitate coordinated care and improved Medicare beneficiary outcomes; and

"(C) in accordance with subsections (b)(1) and (c)(2) modify PAC assessment instruments (as defined in paragraph (2)(B)) applicable to post-acute care providers to-"(i) provide for the submission of standardized patient assessment data under this title with respect

to such providers; and

An Act

cross-setting process quality measure adopted to meet the

requirements of the Improving

DRR is an assessment-based,

Medicare Post-Acute Care

Transformation (IMPACT) Act

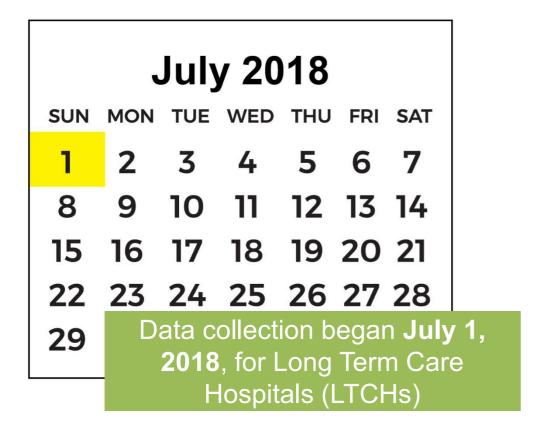
domain of medication

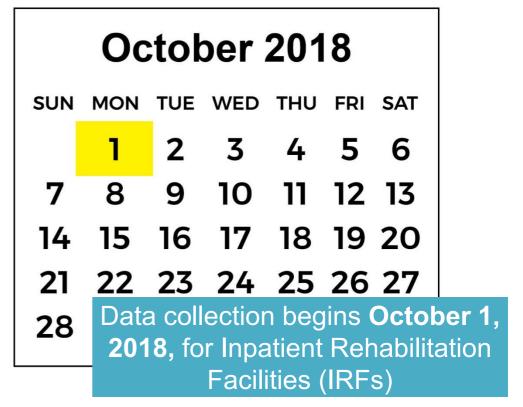
reconciliation





Drug Regimen Review Conducted With Follow-Up for Identified Issues (cont.)



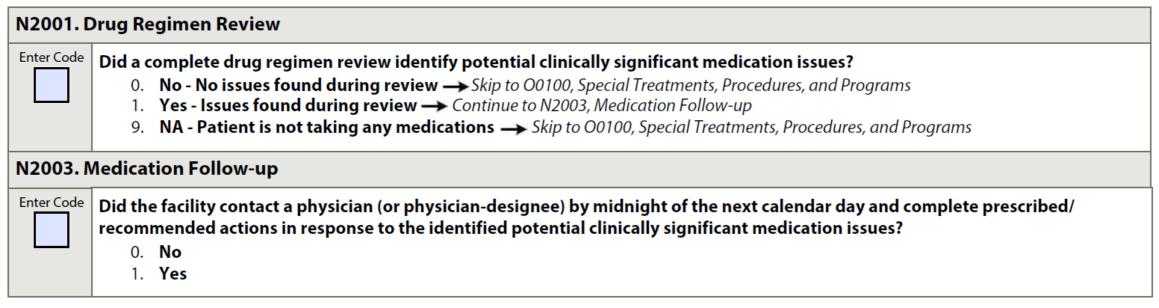






New Items: N2001 and N2003

Added to the Admission Assessment







New Item: N2005

IRFs: Added to the Discharge Assessment

LTCHs: Added to the Planned Discharge,

Unplanned Discharge and Expired Assessments

N2005. Medication Intervention

Enter Code

Did the facility contact and complete physician (or physician-designee) prescribed/recommended actions by midnight of the next calendar day each time potential clinically significant medication issues were identified since the admission?

- 0. **No**
- 1. Yes
- 9. NA There were no potential clinically significant medication issues identified since admission or patient is not taking any medications







Section N: Medications

Definitions





Drug Regimen Review (DRR)

The DRR in post-acute care (PAC) is generally considered to include:

Medication Reconciliation

A review of all medications a patient is currently using

Drug Regimen Review

A review of the drug regimen to identify and, if possible, prevent clinically significant medication issues





What Does the DRR Include?

The DRR includes all medications:



Prescribed and over-the-counter

 Including nutritional supplements, vitamins, and homeopathic and herbal products



Administered by any route

 Including oral, topical, inhalant, injection, sublingual, parenteral, and by infusion

Includes total parenteral nutrition (TPN) and oxygen





Potential or Actual Clinically Significant Medication Issues

Clinically Significant Medication Issue

 A potential or actual issue that, in the clinician's professional judgment, warrants physician/physician-designee communication and completion of prescribed/recommended actions by midnight of the next calendar day at the latest





Examples of Potential or Actual Clinically Significant Medication Issues

Medication
prescribed despite
medication allergy
noted in the patient's
medical record

Adverse reactions to medications

Ineffective drug therapy

Drug interactions

 Serious drug-drug, drugfood, and drug-disease interactions

Duplicate therapy

 For example, generic name and brand nameequivalent drugs are coprescribed Wrong patient, drug, dose, route, and time errors

Omissions (drugs missing from a prescribed regimen)

Nonadherence (purposeful or accidental)





Potential or Actual Clinically Significant Medication Issues

- Any of these issues must reach a level of clinical significance that warrants notification of the physician/physician-designee for orders or recommendations—by midnight of the next calendar day, at the latest
- Any circumstance that does not require this immediate attention is not considered a potential or actual clinically significant medication issue for the purpose of the DRR items

Examples of potential or actual clinically significant medication issues can be found in Section N of the Quality Reporting Program (QRP) Manual





Contact With Physician (or Physician-Designee)



Communication to the physician (or physician-designee) to convey an identified potential or actual clinically significant medication issue(s)

and

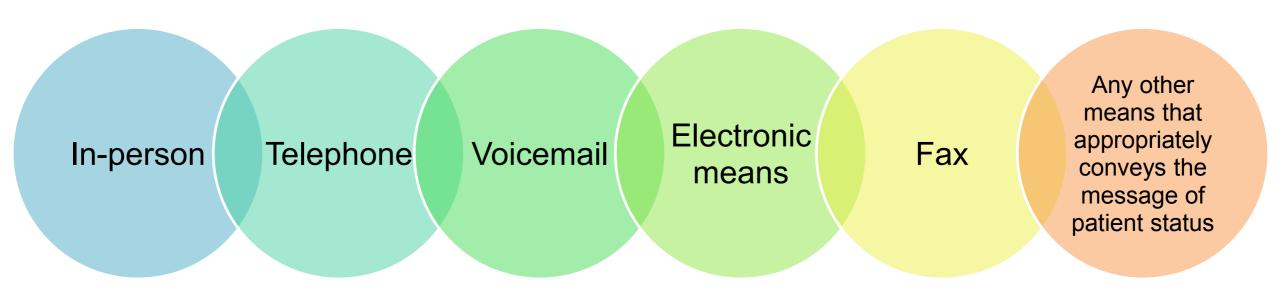
A response from the physician (or physician-designee) to convey prescribed/recommended actions in response to the medication issue(s)





Contact With Physician (or Physician-Designee) (cont.)

Examples of communication methods





How is Physician-Designee Defined?



- The role of physiciandesignee is defined by Federal and State licensure regulations
- Please refer to these regulations to determine which clinicians are licensed to act as physician-designees



Medication Follow-Up

Medication Follow-Up

 The process of contacting a physician (or physician-designee) to communicate the identified medication issue and addressing all physician- (or physician-designee)prescribed/recommended actions by midnight of the next calendar day at the latest







Section N: Medications

Coding Guidance and Practice Coding Scenarios



Data Sources/Resources for Conducting the DRR

Medical Record

 Within the electronic health record, and/or paper medical records as transferred from the acute care hospital

Medication List

 For example, medication administration record (MAR), home medication list

Clinical Communication Notes

 Including pharmacy, nursing, physician (or physiciandesignee), and other applicable clinical notes Acute Care
Hospital
Discharge
Summary and
Discharge
Instructions

Discussions, including with

- The acute care hospital
- Other staff and clinicians responsible for completing the DRR
- Patient and patient family/significant other





Documentation in the Medical Record

 Data in the LTCH CARE Data Set/IRF-PAI should be supported by information documented in the patient's medical record







Who Can Code DRR Items?

- The Centers for Medicare & Medicaid Services (CMS) does not provide guidance on who can or cannot code the DRR items
- Please refer to facility, Federal, and State policies and procedures to determine which LTCH or IRF staff members may complete a DRR
- Each facility determines their policies and procedures for completing the assessments
- Each facility provides patient care according to their unique characteristics and standards (for example, patient population)







N2001, N2003, N2005. Drug Regimen Review Conducted With Follow-Up for Identified Issues

Admission Assessment

N2001

 Identifies if a drug regimen review was conducted upon admission, and if the clinician identified any potential or actual clinically significant medication issues

N2003

 Identifies if the facility contacted a physician (or physician-designee) and completed all physician-(or physician-designee)-prescribed/ recommended actions by midnight of the next calendar day in response to all potential or actual clinically significant medication issues identified upon admission

Discharge Assessment

(For LTCH: Planned or Unplanned, Expired)

N2005

 Identifies if the facility contacted a physician (or physician-designee) and completed all physician- (or physician-designee)-prescribed/ recommended actions by midnight of the next calendar day each time potential or actual clinically significant medication issues were identified throughout the stay





N2001: Drug Regimen Review (Admission)

Complete only at Admission

- 0. No No issues found during review
- 1. Yes Issues found during review
- 9. NA Patient is not taking any medication

Section N		Medications
N2001. D	Orug Regimen Re <mark>v</mark>	<mark>/iew</mark>
Enter Code	 No - No iss Yes - Issues 	ug regimen review identify potential clinically significant medication issues? ues found during review Skip to O0100, Special Treatments, Procedures, and Programs found during review Continue to N2003, Medication Follow-up Skip to O0100, Special Treatments, Procedures, and Program





N2001 Steps for Assessment

1. Complete a drug regimen review upon admission or as close to the actual time of admission as possible to identify any clinically significant medication issues

2. Review the medical record sources to determine if a drug regimen review was conducted upon admission





N2001 Coding Instructions

Code 0, No – No issues found during review

If a drug regimen review was conducted upon admission and no potential or actual clinically significant medication issues were identified

Code 1, Yes –
Issues found during
review

If a drug regimen review was conducted upon admission and potential or actual clinically significant medication issues were identified

Code 9, NA –
Patient is not taking any medications

If a drug regimen review was conducted upon admission and, per data sources/resources reviewed, there were no medications prescribed for the patient and the patient was not taking any medications at the time of the assessment

A dash is a valid response for this item. CMS expects dash use to be a rare occurrence.





N2001 Skip Patterns

Code 0, No – No issues found during review



Skip to O0100. Special Treatments, Procedures, and Programs

Code 1, Yes –
Issues found during
review



Continue to N2003. Medication Follow-up

Code 9, NA –
Patient is not taking any medications



Skip to O0100. Special Treatments, Procedures, and Programs





N2001 Practice Coding Scenario 1

- The admitting PAC nurse reviewed and compared the acute care hospital discharge medication orders and the PAC physician's admission medication orders for Ms. W
- The nurse interviewed Ms. W, who confirmed the medications she was taking for her current medical conditions. Upon the nurse's request, the pharmacist reviewed and confirmed the medication orders as appropriate for the patient
- As a result of this collected and communicated information, the registered nurse (RN) determined that there were no identified potential or actual clinically significant medication issues







How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







N2001 Practice Coding Scenario 2

- Mr. C was admitted to PAC after undergoing mitral valve replacement
- The acute care hospital discharge information indicated that Mr. C had a mechanical mitral heart valve and was to continue receiving anticoagulant medication







N2001 Practice Coding Scenario 2 (cont. 1)

- While completing a review and comparison of the patient's discharge healthcare records from the acute care hospital with the PAC physician's admission medication orders, an RN noted that the admitting physician ordered the patient's anticoagulation medication to be held if the international normalized ratio (INR) was below 1.0
- However the physician's admission note indicated that the desired therapeutic INR parameters for Mr. C was 2.5 to 3.5







N2001 Practice Coding Scenario 2 (cont. 2)

- The RN questioned the INR level listed on the admitting physician's order, based on the therapeutic parameters of 2.5 to 3.5 documented in the physician's admission note
- This prompted the RN to call the physician immediately to address the issue







How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







N2003: Medication Follow-Up (Admission)

Complete only at Admission

0. **No**1. **Yes**

N2003. Medication Follow-up

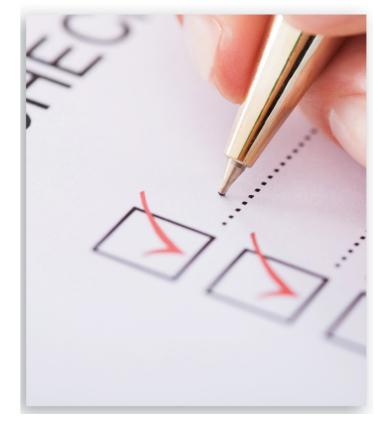
Enter Code
Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/recommended actions in response to the identified potential clinically significant medication issues?

O. No
1. Yes



N2003 Steps for Assessment

- Determine whether the following criteria were met for all potential and actual clinically significant medication issues that were identified upon admission:
 - Two-way communication between the clinician(s) and the physician (or physician-designee) was completed by midnight of the next calendar day; AND
 - All physician- (or physician-designee-)
 prescribed/recommended actions were completed
 by midnight of the next calendar day







N2003 Coding Instructions

Code 0, No

If **all** identified potential or actual clinically significant medication issues were **not** completed **by midnight of the next calendar day**

Code 1, Yes

If the two-way communication AND completion of the prescribed/ recommended actions occurred by midnight of the next calendar day after the potential clinically significant medication issue was identified

A dash is a valid response for this item. CMS expects dash use to be a rare occurrence.





Examples of "By Midnight of the NextCalendar Day"



Example 1

- A clinically significant medication issue is identified at 10:00 a.m. on 9/12/2018
- The physician's (or physiciandesignee's) prescribed/ recommended action is completed on or before 11:59 p.m. on 9/13/2018



Example 2

- A clinically significant medication issue is identified at 11:00 p.m. on 9/12/2018
- The physician's (or physiciandesignee's) prescribed/ recommended action is completed on or before 11:59 p.m. on 9/13/2018





Coding Tips



If the physician (or physiciandesignee) recommends an action that will take longer than midnight of the next calendar day to complete, then Code 1, Yes should still be entered as long as by midnight of the next calendar day the clinician has taken the necessary measures to comply with the recommended action





Coding Tips (cont. 1)



If the physician (or physiciandesignee) recommends an action that will take longer than midnight of the next calendar day to complete, then Code 1, Yes should still be entered as long as by midnight of the next calendar day the clinician has taken the necessary measures to comply with the recommended action

Example

Physician writes an order instructing the clinician to monitor the medication issue over the weekend and to call if the problem persists





Coding Tips (cont. 2)



If the physician (or physician-designee) communicates that **no actions** are necessary regarding the reported issues, then Code **1**, **Yes** should still be entered as long as all communications took place before midnight of the next calendar day





N2001 and N2003 Coding When DRR is Not Completed

- If the drug regimen review was not completed upon admission, then N2001 and N2003 are coded with a dash (–)
- A dash value is a valid response for this item; however,
 CMS expects dash use to be a rare occurrence





Provider Q&A #1

Question: If a physician orders medications on admission, and the pharmacist contacts the physician to resolve the question/potential issue, is this still considered an issue?

Answer: If the issue was determined to be clinically significant, then the issue identified by the pharmacist and communicated to the physician and resolved by midnight of the next calendar day meets the requirements for coding N2001 1, Yes, Issues Found During Review, and N2003 1, Yes, Medication Follow-Up, on the admission assessment.





Provider Q&A #2

Question: If a facility-based physician-designee performed the drug regimen review, identified a medication issue, and addressed it without needing to communicate with another physician/physician designee, how should N2001 and N2003 be coded?

Answer: In this scenario, the physician-designee identified and resolved a medication issue and therefore it did not require two-way communication with facility staff.

The definition of a clinically significant medication issue requires the identification of a medication issue that warrants contacting a physician or physician designee (i.e., two-way communication) in a timely manner and addressing all physician (or physician-designee) prescribed/recommended actions by midnight of the next calendar day at the latest. If no clinically significant medication issues were identified then N2001 would be coded **0**, **No** and N2003 would be skipped.





N2003 Practice Coding Scenario 3

- Mr. B was admitted to PAC with an active diagnosis of pneumonia and atrial fibrillation
- The acute care facility medication record indicated that the patient was on a 7-day course of antibiotics and the patient had 3 remaining days of this treatment plan
- The PAC pharmacist reviewing the discharge records from the acute care facility and the PAC admission medication orders noted that the patient had an order for an anticoagulant medication that required INR monitoring as well as the antibiotic







N2003 Practice Coding Scenario 3 (cont. 1)

- On the date of admission, the PAC pharmacist contacted the PAC physician caring for Mr. B and communicated a concern about a potential increase in the patient's INR with this combination of medications, which placed the patient at greater risk for bleeding
- The PAC physician provided orders for laboratory testing so that the patient's INR levels would be monitored over the next 3 days, starting that day
- However, the nurse did not request the first INR laboratory test until after midnight of the next calendar day

How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







How would you code N2003 on the Admission Assessment?

Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/recommended actions in response to the identified potential clinically significant medication issues?

- A. 0, No
- B. **1, Yes**
- C. Enter a dash (-)







N2003 Practice Coding Scenario 4

- Ms. S was admitted to PAC from an acute care hospital
- During the admitting nurse's review of the patient's acute care facility discharge records, it was noted that the patient had been prescribed metformin
- However, admission labs indicated the patient had a serum creatinine of 2.4, consistent with renal insufficiency







N2003 Practice Coding Scenario 4 (cont. 1)

- The PAC admitting nurse contacted the PAC physiciandesignee to ask if this drug would be contraindicated with the patient's current serum creatinine level
- Three hours after the patient's admission to PAC, the PAC physician-designee provided orders to discontinue the metformin and start the patient on a short-acting sulfonylurea for ongoing diabetes management. These medication changes were implemented within the hour





How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







How would you code N2003 on the Admission Assessment?

Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/recommended actions in response to the identified potential clinically significant medication issues?

- A. 0, No
- B. **1, Yes**
- C. Enter a dash (-)





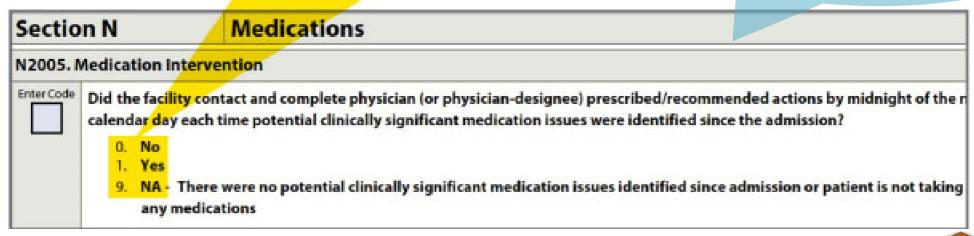


N2005: Medication Intervention (Discharge)

No
 Yes
 NA

IRF: Discharge Assessment

LTCH: Planned Discharge, Unplanned Discharge, and Expired Assessments







N2005 Steps for Assessment



1. Review the patient's medical documentation and identify **all** potential and actual clinically significant medication issues that were identified upon admission and throughout the patient's stay





N2005 Steps for Assessment (cont.)



- 2. Determine if both criteria were met for all potential and actual clinically significant medication issues that were identified upon admission or at any time throughout the patient's stay (admission through discharge):
 - Two-way communication between the clinician(s) and the physician (or physician-designee) was completed by midnight of the next calendar day; AND
 - All physician- (or physician-designee)prescribed/recommended actions were completed by midnight of the next calendar day

N2005 Coding Instructions

Code 0, No

If **all** clinically significant medication issues identified upon admission or at any time throughout the patient stay (admission through discharge) were **not** addressed **by midnight of the next calendar day**

Code 1, Yes

If **all** clinically significant medication issues identified upon admission or at any time throughout the patient stay (admission through discharge) **were** addressed **by midnight of the next calendar day**

Code 9, NA – Not applicable

If there were no potential or actual clinically significant medication issues identified upon admission or throughout the patient stay, or the patient was not taking any medications at the time of admission or throughout the stay

A dash is a valid response for this item. CMS expects dash use to be a rare occurrence.





N2005 Coding Clarification

- Throughout the stay includes admission through and up to the time of the patient's discharge
 - Drug regimen review is conducted upon admission; and
 - Clinicians complete actions recommended by a physician (or physician designee) during a timely follow-up, which are completed each time potential or actual clinically significant medication issues are identified throughout the stay



Provider Q&A #3

Question: If a provider coded item N2003 as **0**, **No**, on the Admission Assessment indicating that the required follow-up action did not take place, is there a way for the facility to code N2005 as **1**, **Yes?**

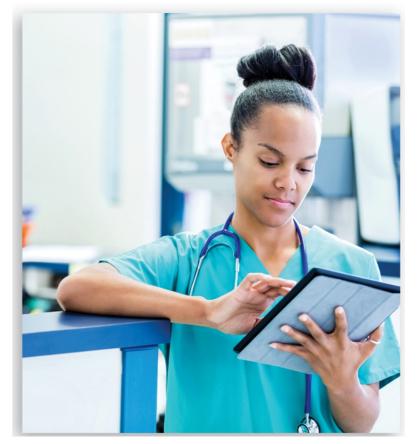
Answer: If N2003 is coded as **0**, No, then N2005 must also be coded **0**, No.

Rationale: Follow-up for ALL identified potential or actual clinically significant medication issues was not completed by midnight of the next calendar day throughout the stay.



N2005 Practice Coding Scenario 5

- At discharge from PAC, the discharging licensed clinician reviewed Ms. T's medical records, which included admission through her entire stay at the PAC
- The clinician noted that a clinically significant medication issue was documented during the admission assessment







N2005 Practice Coding Scenario 5 (cont. 1)

- At admission, Ms. T was taking two antibiotics—an antibiotic
 prescribed during a recent acute care hospital stay that the PAC
 physician had included in her PAC medication orders, and a
 second antibiotic prescribed by the physician upon admission that
 is known for drug-induced nephrotoxicity. Ms. T has renal disease
- Ms. T's medical records further indicated that a PAC nurse had attempted to contact the assigned PAC physician several times about this clinically significant medication issue





N2005 Practice Coding Scenario 5 (cont. 2)

- After midnight of the second calendar day, the PAC physician communicated to the nurse via a telephone order to administer a newly prescribed antibiotic in addition to the previously prescribed antibiotic. The nurse implemented the physician's order
- Upon further review of Ms. T's medical records, the discharging nurse determined that no additional clinically significant medication issues had been recorded throughout the remainder of Ms. T's stay





How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







How would you code N2003 on the Admission Assessment?

Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/recommended actions in response to the identified potential clinically significant medication issues?

- A. 0, No
- B. **1, Yes**
- C. Enter a dash (-)







How would you code N2005 on the Discharge Assessment?

Did the facility contact and complete physician- (or physician-designee)-prescribed/ recommended actions by midnight of the next calendar day each time potential clinically significant medication issues were identified since the admission?

- A. 0, No
- B. **1, Yes**
- C. 9, NA
- D. Enter a dash (-)







N2005 Practice Coding Scenario 6

- At discharge, the licensed clinician completing a review of Ms. K's medical records identified and noted two clinically significant medication issues during the patient's stay
- The patient's record included an order to hold the medication Ms. K was receiving for deep vein thrombosis prophylaxis
- Based on the patient's clinical status, the PAC RN determined that the physician needed urgent notification







N2005 Practice Coding Scenario 6 (cont. 1)

- The day after the observed symptoms were identified and physician notification occurred, the PAC physician provided an order to resume the medication, which was carried out by the nursing staff within the hour
- In addition, a licensed clinician identified a clinically significant medication issue had occurred during the admission assessment period and the physician had been contacted on the same day
- Both medication issues identified during the patient's stay were communicated and addressed by midnight of the next calendar day
- There were no additional clinically significant medication issues identified during the remainder of the PAC stay

How would you code N2001 on the Admission Assessment?

Did a complete drug regimen review identify potential clinically significant medication issues?

- A. **0**, **No** No issues found during review
- B. **1, Yes** Issues found during review
- C. 9, NA Patient is not taking any medications
- D. Enter a dash (-)







How would you code N2003 on the Admission Assessment?

Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/recommended actions in response to the identified potential clinically significant medication issues?

- A. 0, No
- B. **1, Yes**
- C. Enter a dash (-)







How would you code N2005 on the Discharge Assessment?

Did the facility contact and complete physician (or physician-designee) prescribed/recommended actions by midnight of the next calendar day each time potential clinically significant medication issues were identified since the admission?

- A. 0, No
- B. **1, Yes**
- C. 9, NA
- D. Enter a dash (-)









Drug Regimen Review Conducted With Follow-Up for Identified Issues Quality Measure





Drug Regimen Review Conducted With Follow-Up for Identified Issues

Quality Measure Description:

- Reports the percentage of patient stays in which:
 - A drug regimen review was conducted at the time of admission;
 and
 - Timely follow-up with a physician occurred each time potential and actual clinically significant medication issues were identified throughout the patient's stay



Drug Regimen Review Conducted With Follow-Up for Identified Issues (cont. 1)

Patient stays in the denominator in which:

- (1) No potential or actual clinically significant medication issues were found during the review; OR
- 2) Potential and actual clinically significant medication issues were found during the review and a physician was contacted and prescribed/ recommended actions were completed by midnight of the next calendar day; OR
- 3) The patient was not taking any medications.

Numerator



Denominator

Patient stays during the reporting period.





Drug Regimen Review Conducted With Follow-Up for Identified Issues (cont. 2)



Risk Adjustment

• This measure is not risk-adjusted or -stratified





Drug Regimen Review Conducted With Follow-Up for Identified Issues (cont. 3)

Items Included in the Quality Measure:

N2001.
Drug Regimen
Review

N2003. Medication Follow-Up N2005. Medication Intervention

- If a dash is entered for any of these three items:
 - The patient stay will not be included in the numerator count
 - The patient stay will be included in the denominator count





Summary

- Section N is new to the LTCH CARE Data Set v4.00 and IRF-PAI v2.0 and includes the following items:
 - N2001. Drug Regimen Review
 - N2003. Medication Follow-Up
 - N2005. Medication Intervention
- This measure assesses whether providers conducted a drug regimen review upon the patient's admission and throughout the patient's stay and whether any potential or actual clinically significant medication issues identified were addressed in a timely manner

FY 2019 IRF and LTCH Rule Updates

The final rules removed the following measures from the IRF QRP and LTCH QRP:

IRF and LTCH

- National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Methicillin-resistant Staphylococcus aureus (MRSA) Bacteremia Outcome Measure (NQF #1716) beginning with the FY 2020 IRF and LTCH QRPs.
 - Beginning October 1, 2018, IRFs and LTCHs will no longer be required to submit data on this measure for the purposes of the IRF and LTCH QRPs.
- Percent of Residents or Patients Who Were Assessed and Appropriately Given the Seasonal Influenza Vaccine (Short Stay) (NQF #0680) beginning with the FY 2021 IRF and LTCH QRPs.
 - Beginning October 1, 2018, IRFs/LTCHs should enter any of the valid codes or a dash (–) for O0250A, O0250B, and O0250C until the next IRF-PAI and LTCH CARE Data Set is released.

LTCH-only

- National Healthcare Safety Network (NHSN) Ventilator-Associated Event (VAE) Outcome Measure beginning with the FY 2020 LTCH QRP.
 - Beginning October 1, 2018, LTCHs will no longer be required to submit data on this measure for the purposes of the LTCH QRP.





FY 2019 IRF and LTCH Rule Updates (cont.)

- Further, CMS finalized the following:
 - An update to expand the methods by which IRFs and LTCHs are notified of noncompliance with the requirements of the IRF and LTCH QRPs for a program year and how CMS will notify IRFs and LTCHs of a reconsideration decision.
 - IRF-only: To display data on the four assessment-based functional outcome measures in CY 2020.
- For more information, refer to the final rules:
 - FY 2019 IRF PPS final rule: https://www.gpo.gov/fdsys/pkg/FR-2018-08-06/pdf/2018-16517.pdf
 - FY 2019 IPPS/LTCH PPS final rule: https://www.gpo.gov/fdsys/pkg/FR-2018-08-17/pdf/2018-16766.pdf











