

Improving Medicare Post-Acute Care Transformation Act of 2014 (IMPACT Act) Frequently Asked Questions June 30, 2016

Engagement

Q: As a stakeholder, how do I get involved with the implementation of the IMPACT Act?

A: CMS is required to implement many legislative requirements of the IMPACT Act. We welcome and encourage our stakeholder community to partner with us for this incredible transforming opportunity. To collaborate and share information with stakeholders, CMS offers a variety of engagement activities. These include National Provider Calls (NPC), Open Door Forums (ODF), and Special Open Door Forums (SODF). IMPACT Act stakeholders can email CMS directly via the PACQualityInitiative@cms.hhs.gov mailbox, as well as follow the CMS IMPACT Act website for updates. Lastly, we encourage interested stakeholders to please subscribe to the PAC QRP listserv for important updates, upcoming presentations, and training announcements related to the IMPACT Act.

Q: Where do I find archived presentations related to post-acute care and the IMPACT Act?

A: Archived presentations related to cross setting post-acute care and the IMPACT Act are available here. Setting specific presentations related to the IRF QRP, <a href="https://example.com/snc-acute care and the IMPACT Act are available here. Setting specific presentations related to the IRF QRP, <a href="https://example.com/snc-acute care and the IMPACT Act are available here. Setting specific presentations related to the IRF QRP, <a href="https://example.com/snc-acute/snc-acu

O: How do I send feedback to CMS?

A: CMS builds in time during SODFs, ODFs, and NPC calls to answer questions from stakeholders. Additionally, CMS has established an email for cross-setting post-acute care topics and IMPACT Act-related communication. Throughout the process of standardizing post-acute care assessment data, CMS will convene Technical Expert Panels, as well as seek public comment for input on specific content areas, such as measures, assessment instruments, among other issues. Stakeholders are encouraged to monitor CMS activities and participate at their own convenience.



Health Information Technology

Q: How will the Data Element Library (DEL) be used?

A: CMS is developing a Data Element Library (DEL) that will contain PAC assessment instrument data elements from the IRF-PAI, MDS, LCDS, and OASIS. (Note: It does not contain personally identifiable health information.) We believe that the DEL can assist CMS in the standardization of PAC assessment instrument data elements in order to support interoperable health information exchange (HIE) among PAC and other providers.

Q: Can I access and use the DEL?

A: The DEL is currently under development. In the future, CMS anticipates that the public will be able to access content from the Data Element Library database.

Assessment Instruments

O: Will there be one assessment instrument?

A: The current assessment instruments: the Minimum Data Set (MDS) for Skilled Nursing Facilities (SNF), the Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI), the long-term care hospital (LTCH) Continuity Assessment Record and Evaluation (CARE) Data Set for LTCHs, and the Outcome and Assessment Information Set (OASIS) for Home Health Agencies (HHA), will be modified and standardized to meet the requirements as set forth within the IMPACT Act.

Q: Will the current assessment instruments be adapted or will there be a different one?

A: The current assessment instruments (MDS, IRF-PAI, LTCH CARE, and OASIS) will not be replaced, rather as required, they will be modified in order to allow for the collection of a core set of standardized patient assessment-based items as mandated by the IMPACT Act of 2014.

Q: How does Section GG fit in?

A: The new Section GG: Functional Abilities and Goals, was developed in order to collect self-care and mobility activities in PAC settings. CMS has finalized the collection of these functional activities in the FY16 final rules for LTCHs, IRFs, and SNFs by means of the mandated



assessment instruments, the Minimum Data Set (MDS) for Skilled Nursing Facilities (SNF), the Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI), and the Long-Term Care Hospital (LTCH) Continuity Assessment Record and Evaluation (CARE) Data Set for LTCHs. CMS is developing functional process and outcome measures, collected by these assessment instruments, in order to standardize functional outcomes across PAC settings. As an example, effective October 1, 2016, Section GG: Functional Abilities and Goals will be collected in SNFs by means of the MDS. Section GG collects on data items that originate from the CARE tool but will be collected through the MDS. Thus, Section GG data items will be collected per standard MDS data collection methods. Training for SNFs is forthcoming so please watch for CMS announcements.

This document is intended to provide guidance on IMPACT Act cross-setting-related questions that were received by the PACQualityInitiative Help Desk during the 2nd quarter (April – June) of 2016. Responses contained in this document may be time-limited, and may be superseded by guidance published by CMS at a later date.