

The IMPACT Act of 2014 and Data Standardization

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Agenda/Learning Objectives

- Overview of the IMPACT Act: Improving Medicare Post-Acute Care Transformation Act of 2014
- Data Elements Assessment and Standardization
- Quality Measures and Implementation Phases
- Estimated Timelines Per Setting
- Stakeholder Engagement
- Questions and Answers

Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014

- Bipartisan bill passed on September 18, 2014 and signed into law by President Obama on October 6, 2014
- Requires Standardized Patient Assessment Data that will enable:
 - Data Element uniformity
 - Quality care and improved outcomes
 - Comparison of quality and data across post-acute care (PAC) settings
 - Improved discharge planning
 - Exchangeability of data
 - Coordinated care

Driving Forces of the IMPACT Act

Purposes Include:

- Improvement of Medicare beneficiary outcomes
- Provider access to longitudinal information to facilitate coordinated care
- Enable comparable data and quality across PAC settings
- Improve hospital discharge planning
- Research

Why the attention on Post-Acute Care:

- Escalating costs associated with PAC
- Lack of data standards/interoperability across PAC settings
- Goal of establishing payment rates according to the individual characteristics of the patient, not the care setting

PAC Matters LTCH, IRF, HH, Nursing Homes



Long-Term Care Hospital (LTCH)

Services provided: Inpatient services include rehabilitation, respiratory therapy, pain management, and head trauma treatment.

No. of Facilities: 420

Average length of stay: 26 days

No. of Beneficiaries: 124k

LTCH CARE - LTCH

Continuity Assessment Record and Evaluation (CARE) Data Set submissions: **76K**

Medicare spending: \$5.5 billion

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/LTCH-Quality-Reporting/index.html



Home Health Agency (HHA)

Services provided: Skilled nursing or therapy services provided to Medicare beneficiaries who are homebound.

No. of Facilities: 12,311

No. of Beneficiaries: 3.4 million

OASIS: Outcome and Assessment Information Set (OASIS) submissions: 35 million

Medicare spending: \$18 billion

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/index.html



Inpatient Rehabilitation Facility (IRF)

Services provided: Intensive rehabilitation therapy including physical, occupational, and speech therapy.

No. of Facilities: 1,166

Average length of stay: 13 days

No. of Beneficiaries: 373k

IRF-PAI – IRF-Patient Assessment Instrument (PAI) submissions: 492k

Medicare spending: \$6.7 billion

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/index.html



Nursing Homes

Services provided: Short-term Skilled nursing and rehabilitation services to individuals whose health problems are too severe or complicated for home care or assisted living.

No. of Facilities: 15,000

Average length of stay: 39 days

Beneficiaries: 1.7 million

MDS - Minimum Data Set submissions: 20 million

Medicare spending: \$28.7 billion

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/index.html



Legislative Background on Data Standardization

Benefits Improvement & Protection Act (BIPA) of 2000

 Required the Secretary to report to Congress on standardized assessment items across PAC settings

Deficit Reduction Act (DRA) of 2005

- Required the standardization of assessment items used at discharge from an acute care setting and at admission to a post acute care setting
- Established the Post-Acute Care Payment Reform Demonstration (PAC-PRD) to harmonize payments for similar settings in PAC settings
- Resulted in the Continuity Assessment Record and Evaluation (CARE) tool, a component to test the reliability of the standardized items when used in each Medicare setting

PAC Reform Demonstration requirement of 2006

Data to meet federal Health Information Technology (HIT) interoperability standards



PAC-PRD & the CARE Tool: Goals and Guiding Principles

Goals

- ✓ Fosters seamless care transitions
- ✓ Measures that can follow the patient
- ✓ Evaluation of longitudinal outcomes for patients that traverse settings
- ✓ Assessment of quality across settings
- ✓ Improved outcomes, and efficiency
- ✓ Reduction in provider burden

Data Uniformity

- ✓ Reusable
- ✓ Informative
- ✓ Increases Reliability/validity
- ✓ Facilitates patient care coordination

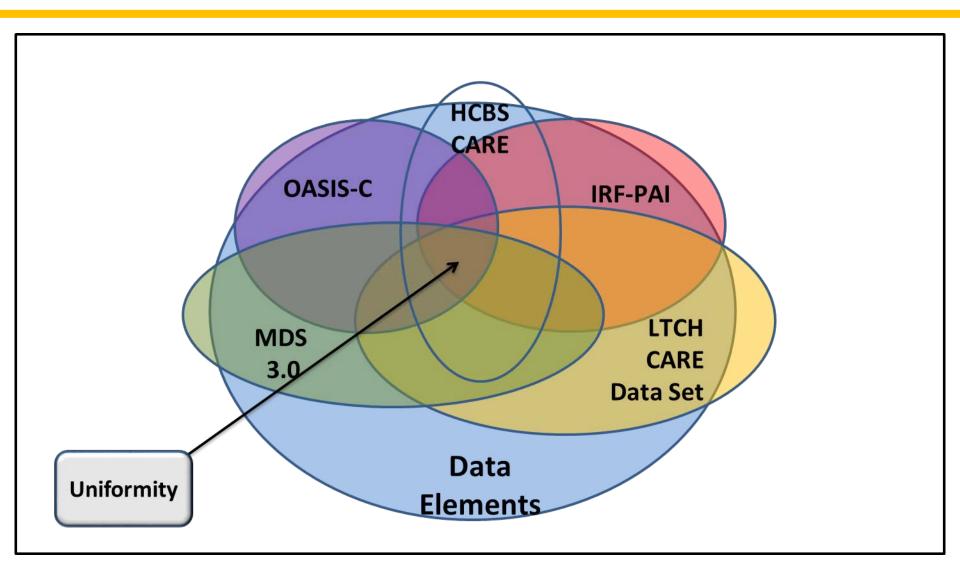


Interoperability

- ✓ Data that can communicate in the same language across settings
- ✓ Data that can be transferable forward and backward to facilitate care coordination
- ✓ Follows the individual

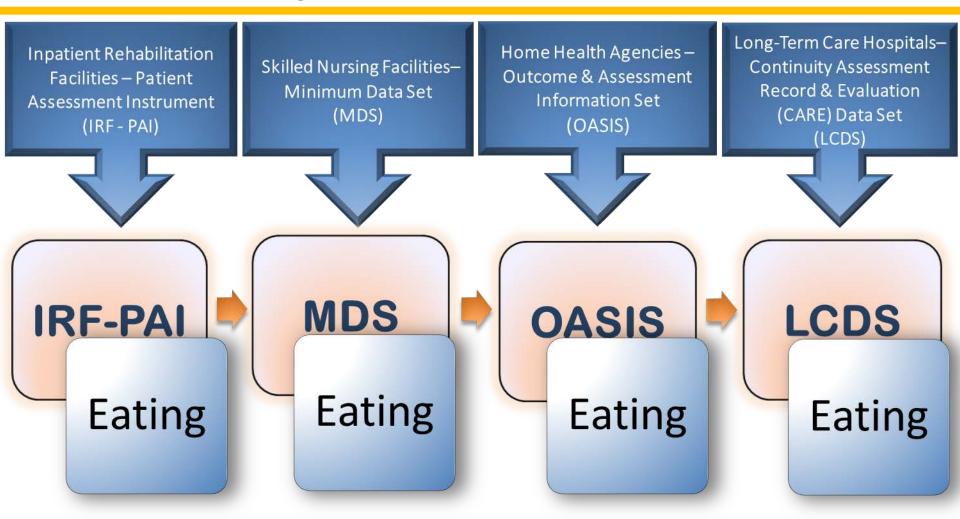


Data Elements: Standardization



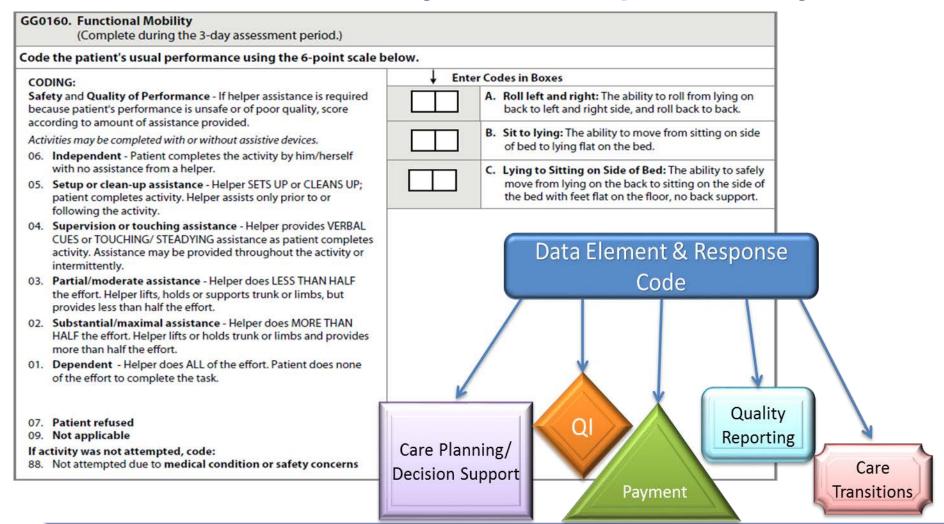


What is Standardization? Standardizing Function at the Item Level



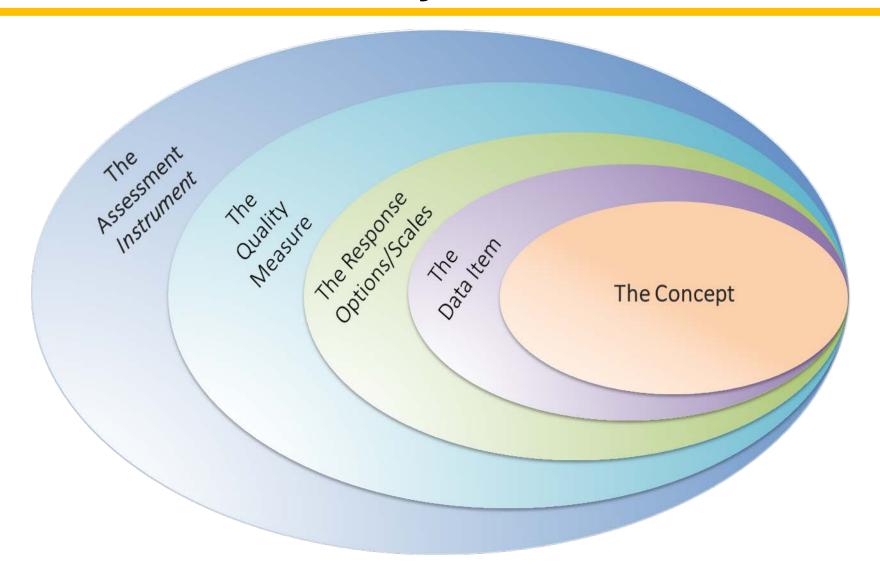
Standardized Assessment Data Elements

One Question: Much to Say → One Response: Many Uses





Standardization Beyond the Item





Standardizing Across Settings

Item	Item Description	Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI) v1.4	Minimum Data Set (MDS) 3.0	Long-Term Care Hospital CARE Data Set v3.00
SELF-CARE GG0130				
A	Eating	✓	✓	✓
В	Oral hygiene	✓	✓	✓
С	Toileting hygiene	✓	✓	✓
D	Wash upper body	_	_	✓
Е	Shower/bathe self	✓	_	_
F	Upper body dressing	✓	_	_
G	Lower body dressing	✓	_	_
Н	Putting on/taking off footwear	✓	_	_

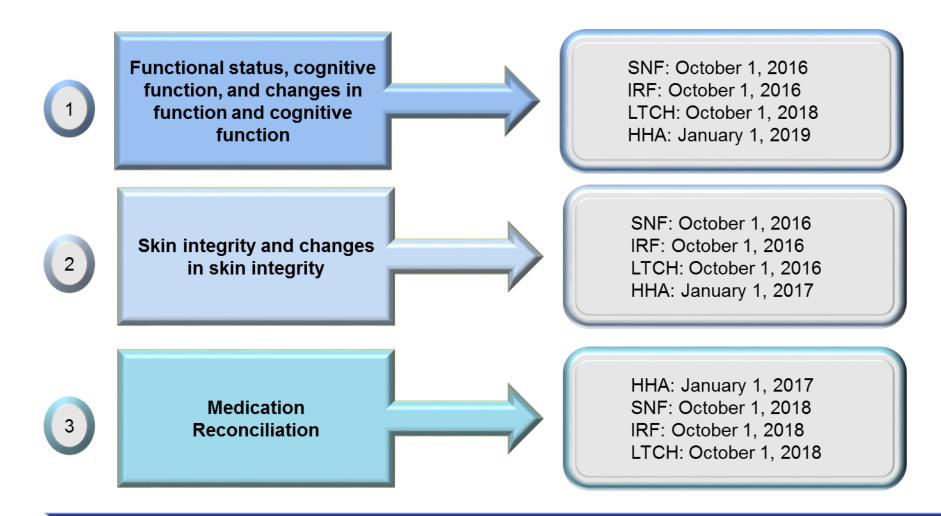


Standardizing Across Settings (continued)

Item	Item Description	Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI) v1.4	Minimum Data Set (MDS) 3.0	Long-Term Care Hospital CARE Data Set v3.00
MOBILIT	TY GG0170			
A	Roll left and right	✓	_	✓
В	Sit to lying	✓	✓	✓
С	Lying to sitting on side of bed	✓	✓	✓
D	Sit to stand	✓ ✓		✓
Е	Chair/bed-to-chair transfer	✓	✓	✓
F	Toilet transfer	✓	✓	✓
G	Car transfer	✓	_	_
I	Walk 10 feet	✓	_	✓
J	Walk 50 feet with two turns	✓	✓	✓
K	Walk 150 feet	✓	✓	✓
L	Walking 10 feet on uneven surface	~	_	_
M	1 step (curb)	✓	_	_
N	4 steps	✓	_	_
О	12 steps	✓	_	_
P	Picking up object	√	_	_
R	Wheel 50 feet with two turns	✓	✓	✓
S	Wheel 150 feet	✓	✓	✓

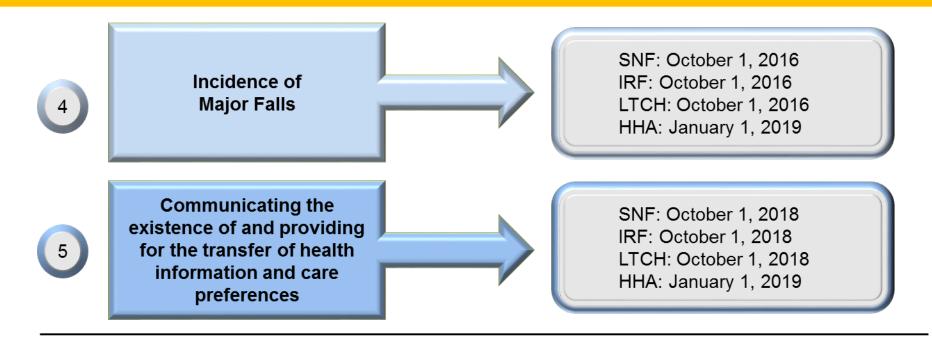


IMPACT Act: Quality Measure Domains and Timelines





IMPACT Act: Quality Measure Domains and Timelines (continued)



Resource use and other measures will be specified for reporting

- ✓ Total estimated Medicare spending per beneficiary
- ✓ Discharge to community
- Measures to reflect all-condition risk-adjusted potentially preventable hospital readmission rates



SNF: October 1, 2016 IRF: October 1, 2016 LTCH: October 1, 2016 HH January 1, 2017



National Quality Strategy Promotes Better Health, Healthcare, and Lower Cost

The strategy is to concurrently pursue three aims:

Better Care

Improve overall quality by making health care more patient-centered, reliable, accessible, and safe.

Healthy People / Healthy Communities

Improve population health by supporting proven interventions to address behavioral, social and environmental determinants of health, in addition to delivering higherquality care.

Affordable Care

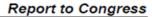
Reduce the cost of quality healthcare for individuals, families, employers and government.



NQS Promotes Better Health, Better Healthcare, and Lower Costs Through:

Six Priorities

- Make care safer by reducing harm caused in the delivery of care
- Ensure that each person and family are engaged as partners in their care
- Promote effective communication and coordination of care
- Promote effective prevention and treatment practices for the leading causes of mortality, starting with cardiovascular disease
- Work with communities to promote wide use of best practices to enable healthy living
- Make quality care more affordable for individuals, families, employers, and governments by developing and spreading new healthcare delivery models.



National Strategy for Quality Improvement in Health Care

March 2011



The Six Priorities Have Become the Goals for the CMS Quality Strategy



Strengthen person & family engagement

Promote effective communication & coordination of care

Promote effective prevention & treatment

Work with communities to promote best practices of healthy living

Make care affordable

CMS Framework for Measurement

Clinical Quality of Care

- Care type (preventive, acute, post-acute, chronic)
- Conditions
- Subpopulations

Person & Caregiver-Centered Experience & Outcomes

- Patient experience
- Caregiver experience
- Preference- and goaloriented care

Care Coordination

- Patient and family activation
- Infrastructure and processes for care coordination
- Impact of care coordination

Population/ Community Health

- · Health Behaviors
- Access
- Physical and Social environment
- Health Status

Function

Safety

- All-cause harm
- HACs
- HAIs
- Unnecessary care
- · Medication safety

Efficiency and Cost Reduction

- Cost
- Efficiency
- Appropriateness

- Measures should be patientcentered and outcome-oriented whenever possible
- Measure
 concepts in each
 of the six
 domains that are
 common across
 providers and
 settings can form
 a core set of
 measures

Addressing Critical Gaps IMPACT Act & Opportunity

The IMPACT Act provides an opportunity to address all goals within the CMS Quality Strategy:



IMPACT Act: Measurement Implementation Phases

- 1) Measurement Implementation Phases
 - (A) Initial Implementation Phase
 - (i) Measure specification
 - (ii) Data collection
 - (B) Second Implementation Phase Feedback reports to PAC providers
 - (C) Third Implementation Phase –
 Public reporting of PAC providers' performance
- 2) Consensus-based Entity Endorsement Evaluation
- 3) Treatment of Application of Pre-Rulemaking Process

Quality Measures

2015 Measures Under Consideration (MUC)

CMS anticipates placing measures on the 2015 MUC list to satisfy the following IMPACT Act measure domains:

- Medication reconciliation
- Resource use measures, including total estimated Medicare spending per beneficiary
- Discharge to community
- All-condition risk-adjusted potentially preventable hospital readmissions rates

Quality Measures (continued)

Ad Hoc MUC

- Percent of Residents/Patients/Persons with Pressure Ulcers
 That Are New or Worsened * **
- Percent of Patients/Residents/Persons With an Admission and Discharge Functional Assessment and a Care Plan that Addresses Function*
- Percent of Residents/Patients/Persons Experiencing One or More Falls with Major Injury*
- * Finalized in IRF, LTCH, and SNF FY 2016 rule
- ** Proposed in Home Health CY 2016 rule

Associated Measure Activities to Support the IMPACT Act Quality Measure Domains

• New measure development includes:

- Function outcome measures
- Cognition outcome measures
- Communicating the existence of and providing for the transfer of health information and care preferences
- Other measures to address cross-setting gaps in quality

Measure maintenance/enhancement and new development for additional care settings:

- NQF #0678: "Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened"
- NQF #0674: "Percent of Residents Experiencing One or More Falls with Major Injury"



Measures Mapped to IMPACT Act Domains

LTCH				
Domain	NQF ID	Measure Title	Reporting and Payment Timeline	
Skin Integrity	#0678	Percent of Residents with Pressure Ulcers That are New or Worsened (Short-Stay)	Initial Reporting April–	
Incidence of Major Falls	Application of #0674	Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)	December 2016 for fiscal year (FY) 2018 payment adjustment followed by CY reporting for that of subsequent FYs	
Function	Application of #2631	Percent of LTCH Patients with an Admission and Discharge Functional Assessment & a Care Plan That Addresses Function		



Measures Mapped to IMPACT Act Domains (continued)

НН			
Domain	NQF ID	Measure Title	Reporting and Payment Timeline
Skin Integrity	#0678	Percent of Residents or Patients with Pressure Ulcers that are New or Worsened (Short Stay)	Proposed reporting begins January 2017 for proposed calendar year (CY) 2018 payment adjustment and that of subsequent CYs



Measures Mapped to IMPACT Act Domains (continued)

SNF				
Domain	NQF Measure ID	Measure Title	Reporting and Payment Timeline	
Skin Integrity	#0678	Percent of Residents with Pressure Ulcers That are New or Worsened (Short-Stay)	Initial Reporting October – December 2016 for fiscal year (FY) 2018 payment adjustment followed by CY reporting for that of subsequent FYs	
Incidence of Major Falls	Application of #0674	Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)		
Function	Application of #2631	Percent of LTCH Patients with an Admission and Discharge Functional Assessment & a Care Plan That Addresses Function		



Measures Mapped to IMPACT Act Domains (continued)

IRF				
Domain	NQF Measure ID	Measure Title	Reporting and Payment Timeline	
Skin Integrity	#0678	Percent of Residents with Pressure Ulcers That are New or Worsened (Short-Stay)	Initial Reporting October – December 2016 for	
Incidence of Major Falls	Application of #0674	Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)	fiscal year (FY) 2018 payment adjustment followed by CY reporting for that of subsequent FYs	
Function	Application of #2631*	Percent of LTCH Patients with an Admission and Discharge Functional Assessment & a Care Plan That Addresses Function		
Function	#2633*	Change in Self-Care Score for Medical Rehabilitation Patients	<i>Initial</i> Reporting October	
Function	#2634*	Change in Mobility Score for Medical Rehabilitation Patients	- December 2016 for fiscal year (FY) 2018 payment adjustment followed by CY reporting for that of subsequent FYs	
Function	#2635*	Discharge Self-Care Score for Medical Rehabilitation Patients		
Function	#2636*	Discharge Mobility Score for Medical Rehabilitation Patients		



Ongoing QM Development and Stakeholder Engagement (2015)

IMPACT Measure Domain	Technical Expert Panels	Public Comment
Medication Reconciliation	July 2015	September 2015
Discharge to Community	August 2015	September 2015
All-Condition Risk-Adjusted Potentially Preventable Hospital Readmission Rates	August 2015	October 2015
Total Estimated Medicare Spending Per Beneficiary	October 2015	December 2015

Technical Expert Panels site:

https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/TechnicalExpertPanels.html



Pre-Rulemaking Public Comment on Quality Measures

 Measure Applications Partnership (MAP) reviews and provides comments on measures under consideration for federal health programs

Activity	Dates
All MAP Orientation Web meeting (MAP overview)	August 12, 2015
MAP Coordinating Committee In-Person Meeting	September 18, 2015
MAP PAC/LTC Workgroup Web Meeting	October 16, 2015
MAP Coordinating Committee Web meeting	November 13, 2015
Measures Under Consideration List posted for comment	December 1, 2015
MAP PAC/LTC Workgroup In-Person Meeting	December 14 – 15, 2015
MAP PAC/LTC Workgroup deliberations posted for comment	December – January (TBD)
MAP Coordinating Committee In-Person Meeting	January 26 – 27, 2016



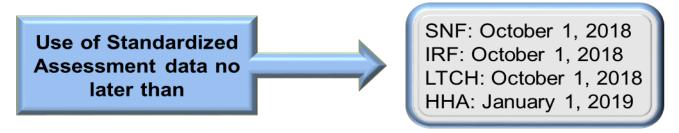
Pre-Rulemaking: Resources

- NQF Calendar of activities:
 http://www.qualityforum.org/EventList.aspx
- MAP Coordinating committee project page:
 http://www.qualityforum.org/Project_Pages/MAP_Coordinating_Committee.
 aspx
- MAP PAC-LTC workgroup project page:
 http://www.qualityforum.org/Project_Pages/MAP_Post-Acute_CareLong-Term_Care_Workgroup.aspx
- CMS's Pre-Rulemaking page:
 https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html

IMPACT Act: Standardized Patient Assessment Data

Requirements for reporting assessment data:

 Providers must submit standardized assessment data through PAC assessment instruments under applicable reporting provisions



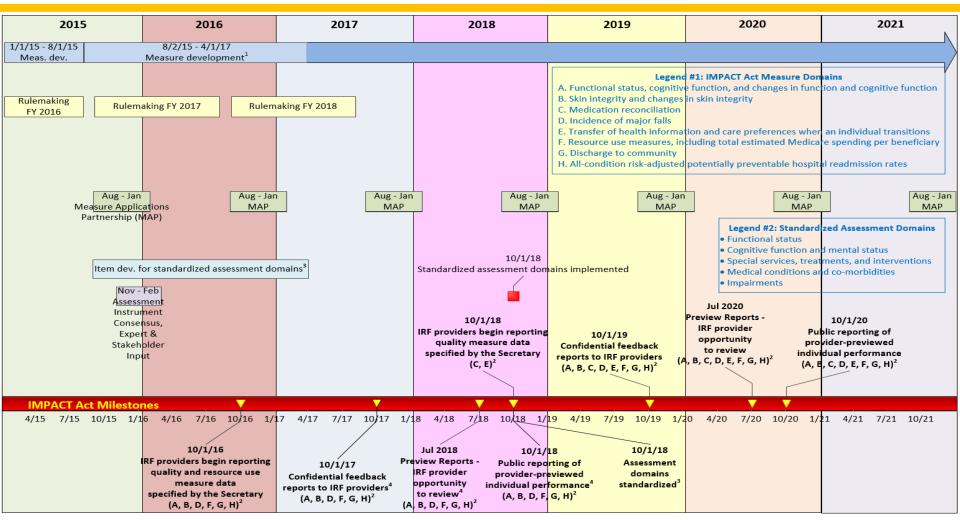
 The data must be submitted with respect to admission and discharge for each patient, or more frequently as required

Data categories:

•Functional status •Cognitive function and mental status •Special services, treatments, and interventions •Medical conditions and comorbidities •Impairments •Other categories required by the Secretary



PAC QRP IRF Estimated Timelines/Milestones to Meet the IMPACT Act of 2014 Timeline Requirements



¹ Quality measure development requires six months to two years and includes public input, stakeholder input, and the MAP process

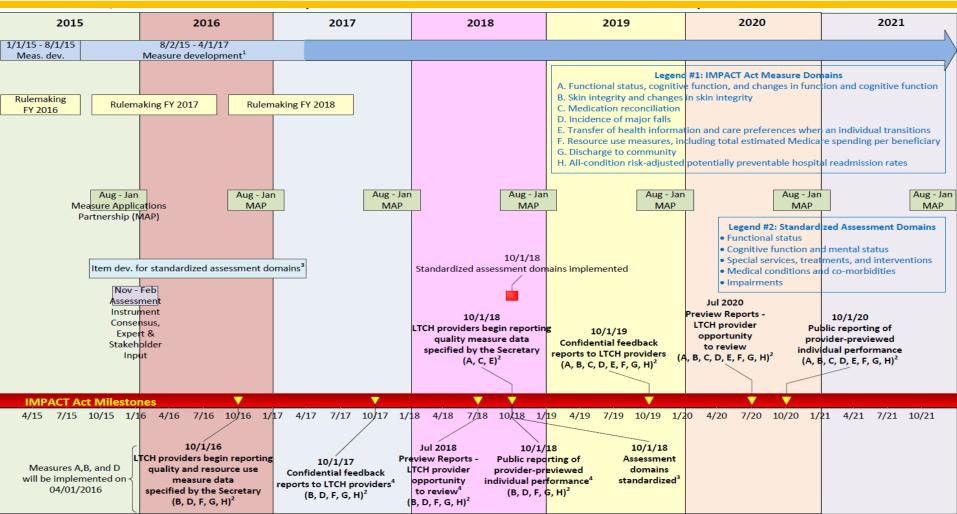
⁴ Provider feedback and preview reports and publicly reported data are refreshed at regular intervals after starting



² IMPACT Act measure domains are defined in legend #1 above

³ IMPACT Act assessment domains are defined in legend #2 above

PAC QRP LTCH Estimated Timelines/Milestones to Meet the IMPACT Act of 2014 Timeline Requirements



¹ Quality measure development requires six months to two years and includes public input, stakeholder input, and the MAP process

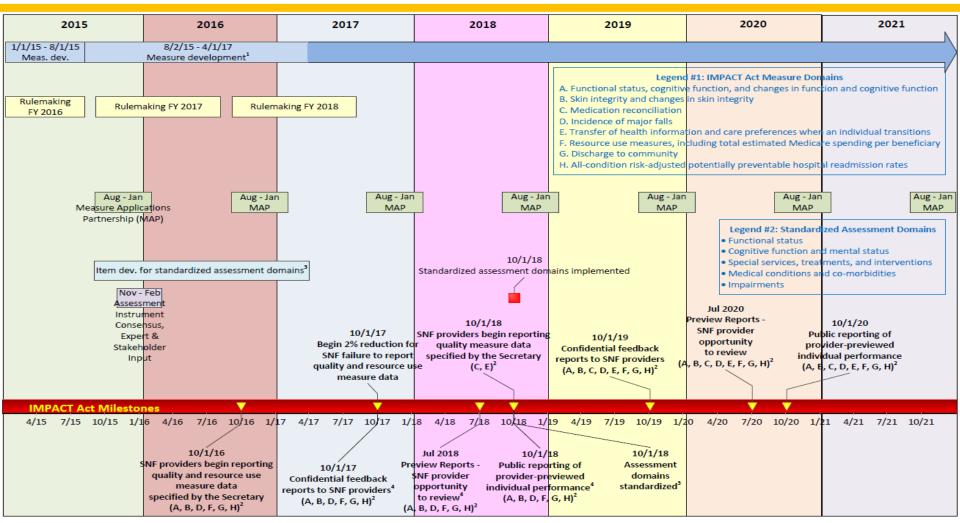
⁴ Provider feedback and preview reports and publicly reported data are refreshed at regular intervals after starting



² IMPACT Act measure domains are defined in legend #1 above

³ IMPACT Act assessment domains are defined in legend #2 above

PAC QRP SNF Estimated Timelines/Milestones to Meet the IMPACT Act of 2014 Timeline Requirements



¹ Quality measure development requires six months to two years and includes public input, stakeholder input, and the MAP process

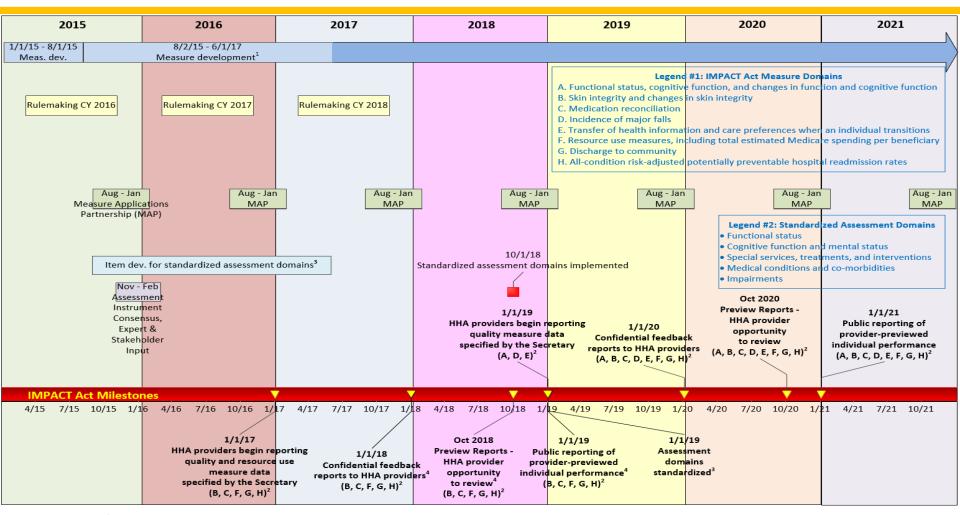
⁴ Provider feedback and preview reports and publicly reported data are refreshed at regular intervals after starting



² IMPACT Act measure domains are defined in legend #1 above

³ IMPACT Act assessment domains are defined in legend #2 above

PAC QRP HHA Estimated Timelines/Milestones to Meet the IMPACT Act of 2014 Timeline Requirements



¹ Quality measure development requires six months to two years and includes public input, stakeholder input, and the MAP process

⁴ Provider feedback and preview reports and publicly reported data are refreshed at regular intervals after starting



² IMPACT Act measure domains are defined in legend #1 above

³ IMPACT Act assessment domains are defined in legend #2 above

PAC Assessment Domain Standardized Data: Stakeholder Opportunities

Consensus Development

- Focus Groups: fall 2015
- Technical Expert Panels (TEPs): fall/winter 2015

Provider Testing

- Recruitment: winter 2015
- Alpha/Beta Testing: spring/fall 2016
- Anticipate Fiscal Year/Calendar Year 2018 rulemaking cycles
 - Public display of draft item sets

Anticipated Outreach Activities Fall 2015

- Open Door Forums (ODFs):
 - SNF, LTC: October 29 and December 1
 - HH, Hospice, DME: November 4 and December 16
- Special Open Door Forum (SODF): Understanding The IMPACT Act-Patient and Family Focused for Informed Decision Making.
 Wednesday, October 28, 2015, from 1:00 p.m. – 3:00p.m. Eastern Time
- CMS Quality Conference Presentation:
 December 1 3, 2015 (planned)
- CMS National Training Program Partner Update Webinar: January 2016 (planned)

Ongoing Outreach & Communications

- Special Open Door Forums (SODFs) Webinars
- eNews updates
- Listening sessions
- Medicare Learning Network (MLN) activities
- YouTube videos
- Conference outreach and speaking engagements

Ongoing Outreach & Communications

(continued)

- Listserv announcements 250,000 providers, 500,000+ subscribers, and Medicare Administrative Contractors (MACs)
- Webpage Enhancement dedicated IMPACT Act web presence featuring:
 - Highlights/special announcements
 - Upcoming events, educational sessions, and stakeholder input opportunities
 - HHAs dedicated IMPACT Act section
 - IRFs dedicated IMPACT Act section
 - LTCHs dedicated IMPACT Act section
 - SNFs dedicated IMPACT Act section
 - Measure Specifications
 - Resources



General Resources

IMPACT Act webpage: https://www.cms.gov/Medicare/Quality-Initiatives/Quality-Initiatives/IMPACT-Act-of-2014-and-Cross-Setting-Measures.html

 Comments can be submitted to: PACQualityInitiative@cms.hhs.gov

Acronyms in this Presentation

- •BIPA: Benefits Improvement & Protection Act
- •CARE: Continuity Assessment Record and Evaluation
- DRA: Deficit Reduction ActHHA: Home Health Agency
- •HIT: Health Information Technology
- •IMPACT Act: Improving Medicare Post-Acute Care Transformation Act
- •IRF-PAI: Inpatient Rehabilitation Facility-Patient Assessment Instrument
- •IRF: Inpatient Rehabilitation Facility
- •LTCH: Long-Term Care Hospital
- •MAP: Measure Applications Partnership
- •MDS: Minimum Data Set
- •MUC: Measures Under Consideration
- NQF: National Quality Forum
- OASIS: Outcome & Assessment Information Set
- •ODFs: Open Door Forums
- •PAC: Post-Acute Care
- •PAC-PRD: Post-Acute Care Payment Reform Demonstration
- QM: Quality Measure
- •QRP: Quality Reporting Program
- •SNF: Skilled Nursing Facility
- •SODFs: Special Open Door Forums



Question & Answer Session



Evaluate Your Experience

- Please help us continue to improve the MLN Connects® National Provider Call Program by providing your feedback about today's call.
- To complete the evaluation, visit http://npc.blhtech.com and select the title for today's call.

Thank You

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