

Centers for Medicare & Medicaid Services
Skilled Nursing Facilities Long Term Care
Open Door Forum
Moderator: Jill Darling
June 22, 2017
2:00 p.m. ET

Operator: Good afternoon. My name is (Tiffany) and I will be your conference facilitator today. At this time I would like to welcome everyone to the Centers for Medicare & Medicaid Services Skilled Nursing Facilities Long Term Care Open Door Forum.

All lines have been placed on mute to prevent any background noise. After the speakers' remarks there will be a question and answer session. If you would like to ask a question during this time, simply press star then the number one on your telephone keypad. If you would like to withdraw your question press the pound key.

Thank you. Jill Darling, you may begin your conference.

Jill Darling: Thank you, (Tiffany). Good morning and good afternoon, everyone, and thank you for joining us today for this SNF Long Term Care Open Door Forum.

Before we begin, as always, one brief announcement from me. This open door forum is not intended for the press and the remarks are not considered on the record. If you are a member of the press you may listen in, but please refrain from asking questions during the Q&A portion of the call. If you have inquires please contact CMS at press@cms.hhs.gov.

And for our only agenda item today we have John Kane, who will go over the SNF advanced notice of the proposal making extension of public comment period.

John Kane: Thanks, Jill, and thanks everyone for being on the call today. So yes, so we just have a brief announcement. I just want to make sure everyone is aware of. On the 14th of this month we have released CMS-1686-N, which was a notice in which we had extended the comment period associated with our Advanced Notice of Proposed Rulemaking, CMS-1686-ANPRM.

And in that ANPRM we discussed a series of revisions that we are considering for the SNF PPS as a result of some research that we have conducted and we were looking for comments from the public on that research and on the results. So that is what we were considering in terms of revisions to the payment system.

So the comment period for that ANPRM was supposed to end on June 26th, which is this upcoming Monday. The notice that I just referenced extends that comment period. And now that comment period for the ANPRM will end on August 25th.

So that gives everyone an additional 60 days to come up with comments and questions and issues associated with the ANPRM and we absolutely invite everyone to please do go ahead and do so.

The only other thing I'll add is that the other rule that we had put back in May, which was the standard SNF proposed rule, CMS-1679-P. The comment period for that is still ending on the 26th, which again is Monday. So please do get in all of your comments on that rule as soon as possible. And that is all we have, so thank you very much, Jill.

Jill Darling: Thanks John. We'll open the line for Q&A please.

Operator: At this time if you would like to ask a question please press star followed by the number one on your telephone keypad. Your first question comes from the line of (Joel VanEaton) with (CCMC). Your line is open.

(Joel VanEaton): Yes, thank you very much for taking my call. The couple of questions on the Quality Reporting Program. First of all I know the suggestion has been made, but I would make it again and that is that more data be available on those

reports to be able to determine where the issues might lie in relationship to information data that's been submitted in order to appropriately correct if it's possible (MDS) has been submitted.

And in that light I was wondering if CMS would consider reopening the review and correct period for the first quarter (earnest) pardon me, the last quarter of 2016, which will affect our payment determinations for 2018.

And the reason is because once we got our reports for first quarter of 2017 a number of people have commented and I am commenting as well that issues have been identified there that we cannot go back and correct in that first period that may have some detrimental effects in terms of our payment for 2018.

So I am wondering if that could be something that CMS would think about and give us an opportunity to go back and review and correct issues that we've identified now with these new review and correct.

And then just a follow up question to that. If the data that is produced on the review and correct reports indicate that we have not met the threshold for submitting a 100 percent of the data 80 percent of the time.

Is that an overall threshold for all the measures (some of the three measures) that we are reporting now this year as the (MDS) or if in one of those measures we miss that threshold will that two percent reduction affect our payments. Thank you.

John Kane: Hey, (Joel), this is John. So I don't believe that we have anyone from CCSQ on the line. So I unfortunately I don't think that's something we are able to address here that is certainly something that if it's more general comments on the QRP programs it's only something you could submit as a comment on the proposed rule that's currently going through. As far as specific questions regarding data that or the review in correct reports (inaudible) it was the first quarter for 20 – (Kevin).

(Male): First quarter of, I mean – first quarter of 2017 is reports that we have currently. But we never had the opportunity to look at a review on our correct report for fourth quarter of 2016, which is the quarter that will – the reporting quarter that will affect our full year of 2018 payments.

And my suggestion or what I am asking is the CMS would be willing to open up that review and correct period again for us because of issues that have identified now that we do actually have review and correct reports.

John Kane: OK, so we can certainly direct that over to our CCSQ colleagues and see if we can get a response out to you.

(Joel VanEaton): And who would I ask, I don't think I ever got a clarification on with this – we have to submit a 100 percent of data 80 percent of the time in order to not receive two percent reduction to our rate.

But my question is, is that if we miss that threshold in just one of the quality reporting measures or as an overall representation of the three quality measures that we are reporting now related to QRP I'd like some clarification on that in terms of how our two percent will be affected specifically related to that sort of issues.

John Kane: Right unfortunately we don't have the staff here at this moment to be able to address that. If you want to e-mail that to me directly I can make sure I go over to the QRP folks and they can get you a response.

(Joel VanEaton): Perfect, thank you.

John Kane: (Thanks a lot, Joel).

Operator: Your next question comes from the line of (Glenn Jones) with (inaudible).
Your line is open.

(Glenn Jones): Good afternoon, thank you. I was just wondering if there is any way to get an update or any kind of projected date when we anticipate the publication of the interpretive guidelines that will be used for the new survey process that we

recently got a slide deck on. Whether there is any formal anticipated date of publications?

John Kane: Again, unfortunately, we don't have the staff here too to address the survey question. I would say your best bet would be direct that either to myself or to the standard ODF mailbox and we can go to be able to survey those.

(Glenn Jones): OK, thanks, John.

Operator: Again to ask a question please press star followed by the number one on your telephone keypad. Your next question from the line of (Trice Disavestro) with (Genesis Healthcare). Your line is open.

(Trice Disavestro): Hi, thank you very much. Hi, John. I can (inaudible) I am sort of disappointed that there is nobody on the line that can answer the Quality Reporting Program question because I would anticipate that a lot of the people on the call today have questions about that, I do for sure.

And I guess my first question is; when will the SNF – we should be able to see some sort of threshold report, when can we expect a threshold reports that's what I think we are very all very interested in seeing.

And then again the first question that you already received -- we need some additional instructions you need to have (occasion) level data in order to do any correction. So you know, again when can we anticipate something like that. Thank you.

John Kane: You know, thank you very much for the question and I do sincerely apologize that we don't have anyone from the QRP shop on the call today to be able to address that question. The best that I can provide you is that right after this call is over I'll shoot over your questions over to the QRP shop and they can try to get answer to you as soon as possible.

(Trice Disavestro): And I'd appreciate that because again we have been sending e-mails and it is taking quite a bit of time to get any responses back. So you know, whatever

you can do to expedite that I mean we are all waiting with (dated breath), so thank you.

John Kane: I'll do my very best. Thank you.

Operator: Your next question comes from the line of (Joel VanEaton) with (CCMC). Your line is open.

(Joel VanEaton): Hey, (inaudible) one other question. On the re-hospitalization of value based purchasing measure. I don't remember reading or may have that I just need clarification on facilities that are newly certified after 2015.

How that comparison will be made, certainly in the proposed rule now we have the more specific data through 2015. But at least couple of facilities that I have worked with particularly were newly certified after 2015. And so how will that work in terms of comparing 2017 data to data that was available on 2015. Thank you.

John Kane: Yes, thank you, (Joel). Again unfortunately our colleagues from CCSQ were not able to attend today. (And so please add on to the e-mail) that you are sending, I mean QRP questions again we can go over to the right folks and make sure we get a response out.

(Joel VanEaton): Thank you.

Operator: Your next question comes from the (Susan DiClare) with (Teracare). Your line is open.

(Susan DiClare): Hi, John. I really don't have a question just a comment that the questions being post regarding QRP the responses if they could be provided to everyone and not just (Joel) and other woman because the other caller because I feel we all have those questions and need them to be answered.

So I am not sure how to disseminate whether on you know, on the CMS site or what but they are pertinent to all of us because I know sometimes questions are post that do not get reported back on these calls for everybody to here. So I just really wanted to impress that if you don't mind.

John Kane: No, thank you very much. (Susan) thank you very much for making that comment.

(Susan DiClare): Yes.

John Kane: You know, definitely, I mean there are questions we try to come back in the following ODF to address. I know definitely that timeframe doesn't always work depending upon the time – the timeframe for the question itself.

One other thing we can do, I mean, the QR – I don't know what the QRP folks have in terms of if they have FAQs or ListServ or something that they are able to blast things out. I know that we have the ODF ListServ and so we can and press upon them the importance of providing an answer that we can blast out through that the ODF ListServ, which we would at least be able to touch on everyone on this call and everyone who is subscribed to that.

(Susan DiClare): Thank you I appreciate it.

John Kane: Thanks, (Susan).

Operator: There are no further questions in queue at this time. I turn the conference back over to our presenters.

Jill Darling: Thanks, everyone, for joining today. I know it was a quick one. And we will be sending out, like John said, a (blurb announcement) regarding all the QRP questions. We'll get in touch with those folks and we'll send out a (blurb) to the ODF ListServ. So we thank you for your time today and have a great day.

Operator: Thank you for participating in today's Centers for Medicare & Medicaid Services Skilled Nursing Facilities Long Term Care Open Door Forum. This call will be available for replay beginning today at 5:00 pm Eastern Time through June 26th at midnight. The conference ID number for the replay is 59210235. The number to dial for the replay is 855-859-2056.

This concludes today's conference call. You may now disconnect.

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