

## MDS Alert

### SNFs: Monitor New CMS Webpages for Crucial IMPACT Act Info

Find out which quality measure domains are under consideration for standardization.

The Improving Medicare Post-Acute Care Transformation Act of 2014 (IMPACT Act) promises to shake up quality data reporting for the post-acute care (PAC) industry. Thankfully, you have new official web resources to reference when you're looking for related information, changes and updates.

The **Centers for Medicare & Medicaid Services** (CMS) created three new webpages under the Nursing Home Quality Initiative category for skilled nursing facility (SNF) quality reporting ([www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/index.html](http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/index.html)). The new webpages are entitled:

1. SNF Quality Reporting  
([www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-Quality-Reporting.html](http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-Quality-Reporting.html));
2. SNF Quality Reporting Reconsideration and Exception & Extension  
([www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-QR-Reconsideration-and-ExceptionExtension.html](http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-QR-Reconsideration-and-ExceptionExtension.html)); and
3. SNF Quality Reporting Program Measures and Technical Information  
([www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-Quality-Reporting-Program-Measures-and-Technical-Information.html](http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/SNF-Quality-Reporting-Program-Measures-and-Technical-Information.html)).

Although the "Reconsideration and Exception & Extension" webpage was still "under construction" at press time, CMS has populated the other two webpages with a variety of information, which focuses on the IMPACT Act.

The new webpages provide information and links to resources on the IMPACT Act, as well as the CMS Post-Acute Care Quality Initiative.

#### Why You Should Care About the IMPACT Act

**Background:** Passed in September 2014, the IMPACT Act requires establishing a quality reporting program for SNFs, as well as requires the submission of standardized quality data by home health agencies (HHAs), long-term care hospitals (LTCHs), inpatient rehabilitation facilities (IRFs) and SNFs (see "Heads Up: How the IMPACT Act Will Change Your Assessments," MDS Alert, Vol. 12, No. 12, page 133).

**Danger:** Beginning fiscal year (FY) 2018, and for each subsequent rate year, CMS will reduce your Medicare payment rates by 2 percentage points if you don't comply with the data submission requirements.

Among other mandates, the IMPACT Act requires that CMS develop and implement quality measures from five quality measure domains using standardized assessment data. Currently, however, CMS has yet to adopt any measures into the SNF quality reporting program.

#### Get Ready for Your Data Reporting to Change

The IMPACT Act requires standardized patient assessment data across settings for assessment and quality measures, quality care and improved outcomes, discharge planning, interoperability, and care coordination. Specifically, CMS plans to standardize the following quality measure domains:

- Skin integrity and changes in skin integrity;
- Functional status, cognitive function, and changes in function and cognitive status;
- Medication reconciliation;
- Incidence of major falls;
- Transfer of health information and care preferences when an individual transitions;
- Resource use measures, including total estimated Medicare spending per beneficiary;
- Discharge to community; and
- All-condition risk-adjusted potentially preventable hospital readmissions rates.

Data categories include: functional status; cognitive function and mental status; special services, treatments and interventions; medical conditions and co-morbidities; and impairments.

According to a Feb. 19 Special Open Door Forum (SODF) on the IMPACT Act, CMS is considering a variety of quality measures, but will take a "phased approach." For example, CMS is considering a quality measure for the percent of residents with an admission and discharge functional assessment and a care plan that addresses function.

Other measures may include the percent of residents or patients with pressure ulcers that are new or worsened (NQF #0678) and percent of residents experiencing one or more falls with major injury (NQF #0674).

**Prepare yourself:** According to CMS, the IMPACT Act requires SNFs to use and report standardized assessment data beginning no later than Oct. 1, 2018. And since CMS has not yet announced what that standardized assessment data will be, you may be left with very little time to prepare before you'll need to begin reporting — all the more reason to keep an eye on the three new webpages.