



# **IPFQR Program: FY 2024 IPF PPS Final Rule and APU Determination**

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# Purpose

- Summarize IPFQR Program changes, per the fiscal year (FY) 2024 Inpatient Psychiatric Facility Prospective Payment System (IPF PPS) final rule
- Describe the FY 2024 annual payment update (APU) determination and reconsideration processes

# Learning Objectives

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Attendees will be able to:

- Explain IPFQR Program changes per the FY 2024 IPF PPS final rule.
- Describe APU determination and reconsideration processes.

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## **Overview**

# FY 2024 Final Rule

- The FY 2024 IPF PPS final rule (88 FR 51054) was published on August 2, 2023, in the *Federal Register* at <https://www.federalregister.gov/documents/2023/08/02/2023-16083/medicare-program-fy-2024-inpatient-psychiatric-facilities-prospective-payment-system-rate-update>.
- IPFQR Program updates are located on pages 51098–51145 of the *Federal Register*.

# Summary of Final Rule Changes

## Executive Summary

CMS finalized the following changes:

- Adopted four new measures:
  1. Facility Commitment to Health Equity
  2. Screening for Social Drivers of Health
  3. Screen Positive Rate for Social Drivers of Health
  4. Psychiatric Inpatient Experience (PIX) Survey
- Removed two measures:
  1. Patients Discharged on Multiple Antipsychotic Medications with Appropriate Justification Hospital-Based Inpatient Psychiatric Services (HBIPS)-5
  2. Tobacco Use Brief Intervention Provided or Offered and Tobacco Use Brief Intervention Provided (TOB-2/-2a)
- Modified COVID-19 Vaccination Coverage Among Health Care Personnel (COVID HCP) measure
- Adopted a data validation pilot program

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## **Measure Updates**

# Adoption of Facility Commitment to Health Equity Measure

- The measure will assess an IPF's commitment to health equity using five equity-related attestation statements in the following domains:
  - Equity is a Strategic Priority
  - Data Collection
  - Data Analysis
  - Quality Improvement
  - Leadership Engagement
- This structural attestation measure does not allow sampling.
- IPFs will submit numerator and denominator values for the calendar year (CY) 2024 reporting period into the Hospital Quality Reporting System during the summer of 2025, impacting the FY 2026 payment determination.
- Refer to Table 17: The Facility Commitment to Health Equity Measure Five Attestations on page 51103 for more details.



# Adoption of Screening for Social Drivers of Health Measure

- The measure will assess the percentage of patients 18 years of age and older screened for the following health-related social needs (HRSNs): (1) Food Insecurity, (2) Housing Instability, (3) Transportation Problems, (4) Utility Help Needs, and (5) Interpersonal Safety
- The measure is applicable to all patients over 18 years old.
- This measure does not allow sampling.
- Voluntary reporting of aggregate numerator and denominator values will begin with data collected in CY 2024 and reported to CMS in CY 2025. Required reporting will begin with data collected in CY 2025, reported to CMS in CY 2026, and impacting the FY 2027 payment determination.
- Refer to Table 18: The Five Core HRSN Domains to Screen for Social Drivers of Health on pages 51108–51110 for more details.

# Adoption of Screen Positive Rate for Social Drivers of Health Measure

- The measure will assess the percentage of patients 18 years of age and older who screen positive for one or more of the core HRSNs: (1) Food Insecurity, (2) Housing Instability, (3) Transportation Problems, (4) Utility Help Needs, and (5) Interpersonal Safety
- Applicable to all patients over 18 years old.
- This measure does not allow sampling.
- Voluntary reporting of aggregate numerator and denominator values will begin with data collected in CY 2024 and reported to CMS in CY 2025. Required reporting will begin with data collected in CY 2025, reported to CMS in CY 2026, and impacting the FY 2027 payment determination.

# Adoption of PIX Survey Measure

- The PIX Survey consists of 23 items in four domains:  
(1) Relationship with Treatment Team, (2) Nursing Presence, (3) Treatment Effectiveness, and (4) Healing Environment
- The measure is applicable for all patients discharged from an IPF who are at least 13 years old and able to complete the survey.
  - Sampling of 300 completed PIX surveys per year is allowed.
  - If an IPF has less than 300 completed surveys per year, then it must submit survey results for all eligible patient discharges.
- IPFs will report a separate rate for each of the four domains as well as a fifth, overall rate to CMS.
  - Voluntary reporting: CY 2025 data reported in CY 2026
  - Required reporting: CY 2026 data reported in CY 2027, impacting the FY 2028 payment determination

# Removal of HBIPS-5 Measure

- CMS removed the HBIPS-5 measure from the IPFQR Program beginning with the FY 2025 payment determination.
- This decision was made based on measure removal Factor 2: Measure does not align with current clinical guidelines or practice.
- IPFs reported HBIPS-5 measure data for the last time during the summer 2023 submission period, impacting FY 2024 payment determination.

# Removal of TOB-2/2a Measures

- CMS removed the TOB-2 measure and the subset measure TOB-2a from the IPFQR Program beginning with the FY 2025 payment determination.
- This is due to the Tobacco Use Treatment Provided or Offered at Discharge (TOB-3) and Tobacco Use Treatment at Discharge (TOB-3a) measures:
  - Addressing smoking cessation interventions that occur during the IPF's discharge process.
  - Offering more opportunity for IPFs to improve their performance.
- TOB-3 and TOB-3a will remain in the IPFQR Program.

# Modify COVID HCP Measure

- CMS updated the numerator of the COVID HCP measure by replacing “complete vaccination course” with “up-to-date.”
- This is effective beginning with data from Quarter 4 CY 2023, to be submitted to the NHSN by the May 15, 2024 deadline, impacting FY 2025 payment determination and subsequent years.
- The update addresses refinements pertaining to the availability and Food and Drug Administration authorization of Moderna and Pfizer-BioNTech COVID-19 vaccines for use as booster doses.
- There are no changes to the measure’s denominator.

# IPFQR Program Measure Set for the FY 2024 Payment Determination

Consensus-Based Entity (CBE) #	Measure
0640	Hours of Physical Restraint Use
0641	Hours of Seclusion Use
0560	Patients Discharged on Multiple Antipsychotic Medications with Appropriate Justification
N/A	Follow-Up After Psychiatric Hospitalization
N/A*	Alcohol Use Brief Intervention Provided or Offered and Alcohol Use Brief Intervention
N/A*	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge
N/A*	Tobacco Use Treatment Provided or Offered and Tobacco Use Treatment
N/A*	Tobacco Use Treatment Provided or Offered at Discharge and Tobacco Use Treatment at Discharge
1659	Influenza Immunization
N/A*	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)
N/A	Screening for Metabolic Disorders
2860	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility
3205	Medication Continuation Following Inpatient Psychiatric Discharge
N/A	COVID-19 Vaccination Coverage Among Health Care Personnel

N/A=The CBE does not endorse the measure.

\*The CBE no longer endorses the measure, but it was endorsed at the time of adoption.

# IPFQR Program Measure Set for the FY 2025 Payment Determination

CBE #	Measure
0640	Hours of Physical Restraint Use
0641	Hours of Seclusion Use
N/A	Follow-Up After Psychiatric Hospitalization
1659	Influenza Immunization
N/A	Alcohol Use Brief Intervention Provided or Offered and SUB-2a Alcohol Use Brief Intervention
N/A	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge
N/A	Tobacco Use Treatment Provided or Offered at Discharge and Tobacco Use Treatment at Discharge
N/A	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)
N/A	Screening for Metabolic Disorders
2860	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility
3205	Medication Continuation Following Inpatient Psychiatric Discharge
N/A	Modified COVID HCP



# IPFQR Program Measure Set for the FY 2026 Payment Determination

CBE #	Measure
0640	Hours of Physical Restraint Use
0641	Hours of Seclusion Use
N/A	Follow-Up After Psychiatric Hospitalization
1659	Influenza Immunization
N/A	Alcohol Use Brief Intervention Provided or Offered and SUB-2a Alcohol Use Brief Intervention
N/A	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge
N/A	Tobacco Use Treatment Provided or Offered at Discharge and Tobacco Use Treatment at Discharge
N/A	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)
N/A	Screening for Metabolic Disorders
2860	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility
3205	Medication Continuation Following Inpatient Psychiatric Discharge
N/A	Modified COVID HCP
N/A	Facility Commitment to Health Equity
N/A	<i>Screening for Social Drivers of Health</i>
N/A	<i>Screen Positive Rate for Social Drivers of Health</i>

Note: Voluntary measures (Screening for Social Drivers of Health and Screen Positive Rate for Social Drivers of Health) are italicized.

# IPFQR Program Measure Set for the FY 2027 Payment Determination

CBE #	Measure
0640	Hours of Physical Restraint Use
0641	Hours of Seclusion Use
N/A	Follow-Up After Psychiatric Hospitalization
1659	Influenza Immunization
N/A	Alcohol Use Brief Intervention Provided or Offered and SUB-2a Alcohol Use Brief Intervention
N/A	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge
N/A	Tobacco Use Treatment Provided or Offered at Discharge and Tobacco Use Treatment at Discharge
N/A	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)
N/A	Screening for Metabolic Disorders
2860	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility
3205	Medication Continuation Following Inpatient Psychiatric Discharge
N/A	Modified COVID HCP
N/A	Facility Commitment to Health Equity
N/A	Screening for Social Drivers of Health
N/A	Screen Positive Rate for Social Drivers of Health
N/A	<i>Psychiatric Inpatient Experience Survey</i>

# IPFQR Program Measure Set for the FY 2028 Payment Determination

CBE #	Measure
0640	Hours of Physical Restraint Use
0641	Hours of Seclusion Use
N/A	Follow-Up After Psychiatric Hospitalization
1659	Influenza Immunization
N/A	Alcohol Use Brief Intervention Provided or Offered and SUB-2a Alcohol Use Brief Intervention
N/A	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge
N/A	Tobacco Use Treatment Provided or Offered at Discharge and Tobacco Use Treatment at Discharge
N/A	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)
N/A	Screening for Metabolic Disorders
2860	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility
3205	Medication Continuation Following Inpatient Psychiatric Discharge
N/A	Modified COVID-19 HCP
N/A	Facility Commitment to Health Equity
N/A	Screening for Social Drivers of Health
N/A	Screen Positive Rate for Social Drivers of Health
N/A	Psychiatric Inpatient Experience Survey

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## **Data Validation Pilot**

# Data Validation Pilot

CMS finalized the data validation pilot.

- The pilot starts with data submitted in 2025 (reflecting care provided in CY 2024).
- The pilot will continue until a full data validation program is proposed and adopted in future rulemaking.
- CMS will randomly select up to 100 IPFs annually to provide eight charts per quarter (32 charts total per year) to calculate all chart-based measures.
- Participants in the validation pilot program will not receive any payment penalties.

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## **FY 2024 APU Determination**

# FY 2024 IPFQR Program Reporting Requirements

- Pledge a status of “Participating” in the IPFQR Program Notice of Participation.
- Submit Quarter 1 through Quarter 4 2022 COVID-19 Vaccination Coverage Among Health Care Personnel (COVID HCP) measure data to the National Healthcare Safety Network by the quarterly deadlines.
- Submit patient-level data for all measures listed below:
  - HBIPS-2 and HBIPS-3 numerator values
  - HBIPS-5
  - SUB-2/-2a, -3/3a
  - TOB-2/-2a, -3/-3a
  - Influenza Immunization
  - Transition Record with Specified Elements Received by Patients
  - Screening for Metabolic Disorders
- Submit facility-level non-measure data and facility-level HBIPS-2 and HBIPS-3 denominator values. (HBIPS-2 and HBIPS-3 share the same denominator.)
- Complete Data Accuracy and Completeness Acknowledgement.

# APU Status Notifications

- Notification letters will be sent in September 2023 to facilities that did not meet one or more of the program requirements.
- Reconsideration requests for decisions are due to CMS 30 days from the date of receipt of the APU decision letter.
- Notifications of APU reconsideration decisions will be sent by CMS to facilities filing a reconsideration approximately 90 days following the submission of the reconsideration request.



# APU Reconsideration Process on QualityNet

Refer to the **APU Reconsideration** page on QualityNet:

<https://qualitynet.cms.gov/ipf/ipfqr/apu#tab2>

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## **Helpful Resources**

# Acronyms

<b>APU</b>	annual payment update	<b>HCP</b>	healthcare personnel
<b>CBE</b>	consensus-based entity	<b>HRSN</b>	health-related social needs
<b>CMS</b>	Centers for Medicare & Medicaid Services	<b>IPF</b>	inpatient psychiatric facility
<b>CY</b>	calendar year	<b>IPFQR</b>	Inpatient Psychiatric Facility Quality Reporting
<b>FAPH</b>	Follow-Up After Psychiatric Hospitalization	<b>PIX</b>	Psychiatric Inpatient Experience
<b>FR</b>	<i>Federal Register</i>	<b>PPS</b>	Prospective Payment System
<b>FY</b>	fiscal year	<b>SDOH</b>	Social Drivers of Health
<b>HBIPS</b>	Hospital-Based Inpatient Psychiatric Services	<b>TOB</b>	Tobacco Use

# Helpful Resources

IPFQR Program Web Pages  
*(Click the icons.)*



# Helpful Resources

Stay up to date...



...and get answers to your questions.



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**Thank You**

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