



# Inpatient Psychiatric Facility Quality Reporting Program

## Support Contractor

### IPFQR Program FY 2020 Annual Payment Update Reconsideration Process

#### Presentation Transcript

##### Speaker

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##### Moderator

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**Evette Robinson:** Hello everyone, and welcome to today's webinar, titled *IPFQR Program Fiscal Year 2020 APU Reconsideration Process*. My name is Evette Robinson, and I am the Program Lead for the IPFQR Program with the VIQR Support Contractor. Before we dive into today's webinar, I wanted to mention that, at the end of the slide presentation, the operator will open the phone lines for a live question-and-answer session. Also, the webinar recording, slides, and transcript for this presentation will be posted on the [QualityNet](#) and [Quality Reporting Center](#) websites at a later date.\* Our presenter for today's event is Lauren Lowenstein, who is the Program Specialist in the Inpatient Psychiatric Facility Quality Reporting Program. Without further ado, I will turn the presentation over to Lauren.

**Lauren Lowenstein:** Thank you, Evette. This is the list of the acronyms that will be referenced in the presentation.

The purpose of today's presentation is to provide information regarding CMS's Inpatient Psychiatric Facility Quality Reporting Program annual payment update reconsideration process for fiscal year 2020. At the end of today's presentation, participants will be able to understand the requirements for the IPFQR Program and the APU reconsideration process, as well as how to file a reconsideration with CMS.

This slide is provided to demonstrate how the IPFQR Program reporting periods relate to the fiscal years, otherwise known as payment years, and communicates that data collection in a particular year affects CMS payment update determinations two years later. Essentially, CMS uses quality data collected by IPFs during a reporting period to make payment decisions for a future year. As you can see in the infographic on this slide, IPFs collected data during the 2018 reporting period were required to submit their data to CMS by August 15, 2019. After the data submission deadline, CMS made preliminary fiscal year 2020 APU decisions, and, as described in the blue box at the top right of the image, CMS provides IPFs with an opportunity to request reconsideration of APU decisions. Those of you attending today's event have the opportunity to submit such a request.

\*Editor's note: The webinar recording, slides, and transcript for this presentation are only posted on the [Quality Reporting Center](#) website, not [QualityNet](#).

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There were 1,668 IPFs eligible to participate in the IPFQR Program for fiscal year 2020. Ninety-seven percent of eligible IPFs met all requirements. Two-point-nine percent are new facilities that are not required to meet program requirements for the payment year 2020. One-point-one percent participated but failed to meet all requirements, and 1.9 percent chose not to participate.

This slide lists the four major requirements to participate in the IPFQR Program and qualify to receive the full fiscal year 2020 APU. Specifically, eligible IPFs had to meet the following requirements by the August 15, 2019 deadline, unless otherwise noted. They needed to have at least one active *QualityNet* Security Administrator, an IPFQR Program Notice of Participation status of “Participating,” submit measure and non-measure data, and complete the DACA form. Eligible IPFs that chose not to participate in the IPFQR Program for fiscal year 2020 or did not meet all of the reporting requirements will be subject to a 2.0 percentage point reduction for their APU.

APU determination notification letters were mailed on September 5, 2019 via FedEx priority overnight delivery 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 on the payment notification letter. Facilities that file an APU reconsideration request will be notified by CMS approximately 90 days after the reconsideration request is submitted.

An overview of the reconsideration process, including the IPF Reconsideration Request Form, can be found on the APU reconsideration page on CMS’s *QualityNet* website. You can access it by going to the direct link that is provided in this slide.

On the current CMS *QualityNet* website, this is how you will access resources related to the APU reconsideration process: From the *QualityNet* homepage, hover over the Inpatient Psychiatric Facilities button, and, from the dropdown menu, select “APU Reconsideration.” There, you will find an overview page for the IPFQR Program APU reconsideration process for fiscal year 2020.

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CMS plans to update the *QualityNet* website in the near future. When these changes take place, the way in which you will access information about the APU reconsideration process will change. This slide details how to access APU reconsideration information once the new *QualityNet* websites are available. From the *QualityNet* homepage, click on the Inpatient Psychiatric Facilities button. In the Inpatient Psychiatric Facility Quality Program box, click on the Learn More button. Next, you will click on the APU button in the top menu and, on the page that appears, you should select APU Reconsideration on the left side of the page. There you will find an overview page for the IPFQR Program APU reconsideration process for fiscal year 2020.

In the APU reconsideration request, your facility must include the CMS-identified reason that it did not meet the APU requirements. Your facility must also specify the reason or reasons for believing it did meet this IPF program requirement or requirements and should receive the full APU. Requests should be specific, complete, and include accurate details. Your facility may include supporting information or documentation as deemed necessary by attaching a PDF file with your Reconsideration Request Form. The completed Reconsideration Request Form may be submitted by either of the methods described on the slide. Upon receipt of the reconsideration request, CMS will provide an email acknowledgement to the facility's CEO and *QualityNet* Security Administrator that the form has been received. CMS expects the process to take no longer than 90 days from the receipt of the Reconsideration Request Form.

If a facility is dissatisfied with the result of CMS's reconsideration determination, the facility may file a Provider Reimbursement Review Board appeal. An appeal can be filed with the PRRB only after the facility has submitted a request for reconsideration and received an adverse decision on the request. Facilities can submit PRRB appeals up to 180 days following the IPF reconsideration notification date. More details about the PRRB process can be found on the CMS website using the direct link found on this slide.

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Please submit all questions regarding the reconsideration process to the IPFQR Program at the email address listed on the slide or by contacting Shannon Kerr at the email address or phone number listed on this slide. At this time, we would like to open the floor for questions.

**Operator:** Thank you. We will now take your questions. To queue up, you can press star (\*) then one (1) on your touch tone phone. If you wish to remove yourself from the queue, you can press the pound (#) sign or the hash (#) key. If you're using a speaker phone, you may need to pick the handset up first before pressing the numbers. So, once again, if you have a question, please press star (\*) then one (1) on your touch tone phone. Please stand by while we allow parties to queue up. We have our first question from Jackie Cantrell. Please go ahead, Jackie.

**Jackie Cantrell:** Hi. Quick question about... We discontinued our inpatient psych facility in October, like October third of 2018. I'm new to the hospital, so nothing was filed for this deadline. When I called and talked with someone at *QualityNet*, they were saying it was probably kind of a moot point because we don't have the patients. We didn't discontinue the CCN number though, so I feel like we're safe, but I just want to make sure.

**Evette Robinson:** Hi, this is Evette from the VIQR Support Contractor and thank you for your question, Jackie. If your CCN is still active and eligible for the IPFQR Program, then it is still subject to the requirements for the program, or it will be subject to that two-percentage point reduction. If you are not, however, seeing any patients and, thereby, not billing CMS or any inpatient psychiatric services to Medicare, that have Medicare, then you are correct in that your reimbursement won't be impacted because you won't be submitting claims. However, if you do have any, if your facility has a desire to at any point in time terminate the CCN, or if you have any additional questions related to that specifically as far as eligibility is concerned, you can certainly contact the VIQR Support Contractor, and, that would be me, primarily, through the IPFQR Program's email address. And, for those attending, that email address is "I" as in icicle, "P" as in Paul, "F" as in facility, quality reporting at "H" "C" "Q" "I" "S" dot org ([IPFQualityreporting@hcqis.org](mailto:IPFQualityreporting@hcqis.org)).

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- Operator:** While I have your line open, Jackie, did you have anything further?
- Jackie Cantrell:** So, if we keep our CCN active, but we're not taking patients, we're going to continue to get late notices and reminders. Is that correct?
- Evette Robinson:** Yes, that is correct.
- Jackie Cantrell:** Okay. I think that's the last of my questions.
- Operator:** Thank you. As a reminder, if you have a question, please star (\*) then one (1) to enter the queue. Standing by for further questions. We have a question from Christina Nunn. Please, go ahead.
- Christina Nunn:** Hi. Thank you. I have two questions. First, I may have missed it earlier in the beginning. Is there a way to save this PowerPoint, or will it be sent to us or somewhere we can access this?
- Evette Robinson:** Hi, Christina. Again, this is Evette. Yes, we did mention at the beginning of this call that the materials related to this webinar will be posted on *QualityNet* and the *Quality Reporting Center* websites.
- Christina Nunn:** Will be? So, they aren't there yet? Do you know when they will be?
- Evette Robinson:** Probably within the next business day.
- Christina Nunn:** Next business day. Okay. Thank you. My next question is you had mentioned once we turn in the reconsideration up to 90 days for results and then facilities will be notified. Who exactly will be notified? Is it the CEO? Is it the person listed on the hospital contact list for the quality program? Is that the person who submits the reconsideration?
- Evette Robinson:** Okay. So, let me kind of answer your question in two parts. Once a reconsideration form is submitted, then we do send an email acknowledgement, as Lauren mentioned, to the facility's CEO. And, if the Security Administrator is also identified on the form, that person is also informed that we've received the form. Then, once the decision is made, that is something that is handled by the appeals contractor. My understanding is that [the decision letter] is typically sent to the CEO.

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- Christina Nunn:** Via United States Postal Service or email?
- Evette Robinson:** Via United States... Well, I'm not sure what postal service, but it is the CEO who receives the hard copy.
- Christina Nunn:** The CEO gets a hard copy. And that is the only person notified of the decision?
- Evette Robinson:** To the best of my knowledge, that is correct. However, if you would like to reach out to Shannon Kerr, as she is leading that particular portion of this process, her information is posted on that slide.
- Christina Nunn:** Okay, I see that. I think that is all the questions I have. Thank you.
- Evette Robinson:** Okay. One other thing I did want to mention in response to your first question, Christina, I do think that the presentation, actually, will only be posted to the *Quality Reporting Center* website. But again, we will provide you with information about that after today's presentation.
- Christina Nunn:** Okay. Thank you.
- Evette Robinson:** You're welcome.
- Operator:** Once again, standing by for questions. It's star (\*) then one (1), if you'd like to queue up. I don't see any further questions in queue.
- Evette Robinson:** Lauren, would you like to wait one more minute to see if anyone comes up with a question before we close the call?
- Lauren Lowenstein:** Sure. Let's wait until a minute has passed.
- Operator:** A final reminder, if you have a question, you can press star (\*) then one (1) to enter the queue. Speakers, just to confirm, I don't see any further questions.
- Evette Robinson:** Okay, great. Well, thank you very much for your assistance, and I think that concludes our call for today.
- Operator:** Thank you, and thank you ladies and gentlemen. This concludes our conference. Thank you for your participation. You may now disconnect.