



Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program

Support Contractor

IPFQR Program: FY 2019 IPF PPS Proposed Rule

Presentation Transcript

Speakers

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Evette Robinson: As a reminder, we do not recognize the raised-hand feature in the chat tool during webinars. Instead, you can submit any questions pertinent to the webinar topic to us via the chat tool. To maximize the usefulness of the question-and-answer (Q&A) transcript, we will consolidate the questions received during this event that pertain to the webinar topic and focus on those that are most important and frequently asked. Any questions received that are not related to the topic of this webinar will not be answered in the chat tool nor in the question-and-answer transcript. Instead, we recommend that you go to the *QualityNet* Q&A tool by clicking on the link on this slide to search for posted Q&A pairs or submit your question via the Q&A tool.

Welcome and thank you for joining us for the IPFQR Program Fiscal Year 2019 IPF PPF Proposed Rule webinar. My name is Evette Robinson and I will be the moderator. I am the Project Lead for the Inpatient Psychiatric Facility Quality Reporting Program Support Contractor and I am delighted to welcome our guest speakers for today's presentation, Dr. Jeffrey Buck and Lauren Lowenstein.

Dr. Buck is the Program Lead for the IPFQR Program and the Senior Advisor for Behavioral Health in the Center for Clinical Standards and Quality in the Centers for Medicare & Medicaid Services, or CMS. Before coming to CMS, Dr. Buck held senior positions in the Substance Abuse and Mental Health Services Administration, known as SAMHSA, and was a section editor for the Surgeon General's report on mental health. Lauren Lowenstein is a Program Specialist in the IPFQR Program. Before coming to CMS, Lauren worked for the [U.S. Department of] Health & Human Services Assistant Secretary for Preparedness and Response in the division of At-Risk Individuals, Behavioral Health & Community Resilience. Lauren received her Master of Public Health degree from the Johns Hopkins Bloomberg School of Public Health and her Master of Social Work degree from the University of Maryland. Before we proceed with today's webinar, I will cover a few more housekeeping items. First, the slides for this presentation were posted to the Quality Reporting Center website at www.QualityReportingCenter.com prior to the event. If you

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did not receive the slides beforehand, you can download them from the Quality Reporting Center website. At the bottom of the home page, you will see a list of upcoming events. Click on the link for this event and you will be able to download the presentation slides. As previously mentioned, this session is being recorded and the slides, transcript webinar recording, and questions and answers from this presentation will be posted on the *QualityNet* and Quality Reporting Center website at a later date.

This presentation will summarize the proposed update to the IPFQR Program as outlined in the Fiscal Year 2019 IPF PPF Proposed Rule.

At the conclusion of this presentation, attendees will be able to interpret the Fiscal Year 2019 IPF PPF Proposed Rule and describe the proposed changes to the IPFQR Program.

Now, I will turn this presentation over to our first speaker, Lauren Lowenstein.

Lauren Lowenstein: Thank you, Evette. In the next few slides, I will provide an overview of the functions of the proposed rule, as well as a brief summary of the changes proposed for the IPFQR Program.

Publication of the proposed rule enables CMS to achieve the following: inform IPFQR Program participants about intended modifications to the program, solicit public comment on proposed changes, and provide ample time for IPFs to prepare for changes that are likely to be confirmed in the final rule.

In this proposed rule, CMS is proposing the following changes: adoption of a new measure removal factor; removal of eight measures for the Fiscal Year 2020 and subsequent years' annual payment update, or APU; removal of the requirement to report sample size counts for measures for which sampling is performed; and CMS is also requesting public comment on possible feature changes to the program.

CMS evaluated the IPFQR Program measure set in the context of the Meaningful Measures Initiative and subsequently identified eight

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measures which we believe are appropriate to remove from the IPFQR Program. This slide lists the eight measures we are proposing to remove from the IPFQR Program for the Fiscal Year 2020 program year and subsequent years.

To clarify, CMS is not proposing any changes to the current IPFQR Program public display and review requirements; to the form, manner, and timing of quality data submission; to sampling guidelines; to the reconsideration and appeals procedures; or to the Extraordinary Circumstances Exceptions (ECE) policy.

Now, I will turn the presentation over to our next speaker, Dr. Jeffrey Buck, who will describe the proposed rule in more detail.

Dr. Jeffrey Buck: Thank you, Lauren. I will begin by describing the adoption of a new removal factor, an application of the proposed changes to the current measure set for the IPFQR Program as described in the FY 2019 IPF PPS Proposed Rule.

CMS is engaging in efforts to ensure that the IPFQR Program measure set continues to promote improved health outcomes for beneficiaries while minimizing the overall cost associated with the program. As part of this effort, we are proposing a new measure removal factor in this proposed rule: The cost associated with a measure outweigh the benefit of its continued use in the program.

CMS is proposing to remove several measures after evaluating the IPFQR measure set under the Meaningful Measures Framework. This framework was described in the previous webinar. We determined that the cost outweighed the benefit of each of the measures listed on this slide. Specifically, we believe the removal of these measures will alleviate some administrative burden to facilities associated with reporting these measures.

Analysis of measure performance indicated that the following three measures are “topped-out” and, therefore, are also proposed for removal from the IPFQR Program beginning with the FY 2020 performance year. By “topped-out,” we mean that the performance on these measures are at a

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very high and relatively unvarying level. The three measures we're proposing to remove under this criterion are: Tobacco Use Screening (TOB-1); Hours of Physical Restraint Use (HBIPS-2); and Hours of Seclusion Use (HBIPS-3).

Next, I will briefly review CMS' proposal to remove the requirement to report sample size count.

The current reporting is for annual reporting of aggregate population counts for Medicare and non-Medicare discharges by diagnostic group and sample size counts for measures for which sampling is performed. In efforts to reduce further reporting burden on facilities, CMS is proposing they no longer require facilities to report sample size counts for measures for which sampling is performed. We note that this proposal does not in any way change our requirement concerning the use of sampling for any of our measures but only changes the information that would be reported to us on the size of the samples used for measure calculation as part of non-measure data collection.

In the next couple of slides, I will review the request for public comment as described in the FY 2019 IPF PPS Proposed Rule.

CMS recognizes that the reporting of aggregate measure data does not allow for data accuracy validation, either by individual facilities or by CMS. For this reason, CMS is considering requiring patient-level data reporting of IPFQR measure data in the future. We believe that this may improve the accuracy of data that were reported, as well as potentially allow facilities to realize efficiencies that are not available under the current method of aggregate reporting.

CMS is considering development of process and outcome measures related to the treatment and management of depression. We recognize the importance of developing a measure that fits into the Meaningful Measure areas of prevention, treatment, and management of mental health and patient experience and functional outcomes, as we believe that the lack of such a measure is indicative of the gap in the current IPFQR measure set.

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CMS is considering future development and adoption of a process measure that measures the number of facilities that administer a standardized assessment instrument, most likely the Patient Health Questionnaire (PHQ-9) at admission and discharge for patients admitted with depression, and a patient-reported outcome measure which assesses a change in patient-reported function based on the change in results on the depression assessment instrument between admission and discharge. The process measure would help ensure that facilities are consistently using a standardized assessment instrument for patients admitted with depression. Once CMS is confident of the consistent administration of this standardized instrument at admission and discharge, then the process measure could be replaced by a patient-reported outcome measure that CMS will develop to compare the patient responses at admission with those at discharge. We believe this potential future patient-reported outcome measure for patients with depression would address the need for measure areas of prevention, treatment, and management of mental health and patient experience and functional outcomes. CMS welcomes public comment on the aforementioned future measure considerations, as well as any other possible new measures or new measure topics.

This concludes my portion of today's webinar. I'll now turn the presentation back over to Evette.

Evette Robinson: Thank you, Dr. Buck. In the next several slides, I will review helpful resources pertaining to this topic, as well as the IPFQR Program in general.

This is a list of the acronyms that were referenced during the presentation.

The Fiscal Year 2019 IPF PPF Proposed Rule is available at the *Federal Register* website and can be accessed by clicking on the first link on this slide. CMS will accept comments on the proposed rule and input on the request for information until June 26, 2018. If you would like to submit a comment electronically, you may do so by either clicking on the green button at the top of the proposed rule that is posted in the *Federal Register* or by clicking on the second link on this slide, which goes to

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www.regulations.gov. Search for Inpatient Psychiatric Facility, and then click on the Comment Now button next to the proposed rule.

This slide contains a link to the Meaningful Measure Framework where you can learn more about CMS' new initiative, Meaningful Measures.

CMS recommends that IPFs refer to the IPFQR Program Manual and various optional paper tools for information pertaining to the IPFQR Program. These materials are available for download on the *QualityNet* and Quality Reporting Center website, which are linked on this slide.

You can click on the title of the table on this slide to access the IPFQR Program Resources page on the *QualityNet* website. Additional active links on this slide are available for you to send us your questions about the IPFQR Program. We encourage you to use the Q&A tool, in particular, because it provides the best means by which we can track questions and answers and, also, delivers our responses directly to your email inbox. Additionally, this is a great way for you to let us know what types of questions and topics you would like for us to address in future webinars. We recommend that you sign up for the IPFQR Program ListServes, if you not already done so, so that you can receive communications which we will send out to the IPFQR community pertaining to webinars, program updates, and other announcements. You can sign up to be added to the ListServe on the *QualityNet* ListServe Registration page.

On this slide, we have a list of upcoming educational webinar events that are planned through the month of August 2018. Again, please monitor your emails to ensure that you receive information regarding these webinars via the IPFQR Program ListServe at a later date.

This concludes the content portion of today's webinar titled *IPFQR Program FY 2019 IPF PPS Proposed Rule*. We thank you for your time and attention.