



Medicare's FY 2018 Final IPPS Rules

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FY 2018 IPPS -- Final





IPPS



- **Posted on August 2nd**
- **To be Published in August 14th Federal Register**

- **Copy at:**
- **<https://s3.amazonaws.com/public-inspection.federalregister.gov/2017-16434.pdf>**

- **Tables for IPPS at:**
- **<https://www.cms.gov/Medicare/medicare-Fee-for-Service-Payment/AcuteInpatientPPS/index.html>**

- **Tables for LTCH at:**
- **<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/LongTermCareHospitalPPS/index.html>**



IPPS Update

Market Basket Increase



- MB is **2.7** percent –
- Offsets:
 - (-0.6%) for productivity
 - (-0.75%) for ACA mandate
 - Subtotal = 1.35 percent increase
 - (+0.4588) for documentation and coding per 21st Century Cures Act and MACRA



Current FY 2017 IPPS Rates



- **To calculate FY 2018 rates, start with current**
- **Careful - CMS corrected FY 2017 rates since the August 22, 2016 Final Rule**
 - **See October 5th, 2016 retroactive to October 1 via Federal Register notice**
 - **Copy is at: <https://www.gpo.gov/fdsys/pkg/FR-2016-10-05/pdf/2016-24042.pdf>**



Quality & EHR Reductions



- **FY 2018 regarding failures to report quality and be a meaningful EHR user**
 - **No Quality –**
 - $\frac{1}{4}$ of market basket [$0.25 \times 2.7 = -0.675$]
 - **No EHR**
 - $\frac{3}{4}$ of market basket [$0.75 \times 2.7 = -2.025$]
- **Failure to not report quality or be an EHR user is in effect a zero rate of increase w/o other adjustments**



Labor Share



- **CMS has revised & rebased market basket computation**
- **Results in major change to large urban labor share**
 - **“Large” Urban areas – those with wage index greater than 1.000 – would be at **68.3** percent – down from 69.6**
 - **“Other” areas with wage index values equal to or less than 1.000 remain at 62.0 percent by law**
 - **Will impact all via budget neutrality**



FY 2018 IPPS Rates



- **Following tables show how CMS arrives at proposed payment rates**
- **Tables are in Addendum**



2018 IPPS Market Basket Increases



	Hospital Submitted Quality Data and is a Meaningful EHR User	Hospital Submitted Quality Data and is NOT a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is NOT a Meaningful EHR User
Market Basket Rate-of-Increase	2.7	2.7	2.7	2.7
Adjustment for Failure to Submit Quality Data (1/4 of MB)	0.0	0.00	-0.675	-0.675
Adjustment for Failure to be a Meaningful EHR User (3/4 of MB)	0.0	-2.025	0.0	-2.025



2018 IPPS Market Basket Increases



	Hospital Submitted Quality Data and is a Meaningful EHR User	Hospital Submitted Quality Data and is NOT a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is NOT a Meaningful EHR User
Multi Factor Productivity (MFP) Adj	-0.6	-0.6	-0.6	-0.6
Statutory ACA Adjustment	-0.75	-0.75	-0.75	-0.75
Applicable Percentage Increase Applied to Standardized Amount	1.35	-0.675	0.675	-1.35



Current Unadjusted FY 2017 IPPS Rates



Current FY 2017 Rates	Hospital Submitted Quality Data and is a Meaningful EHR User
Large Urban Areas Labor Non-Labor Total	 \$3,839.23 <u>\$1,676.91</u> \$5,516.14
All Others Labor Non-Labor Total	 \$3,420.01 <u>\$2,096.13</u> \$5,516.14



FY 2018 IPPS Rates



- **Divide current 2017 rates as follows:**
 - **\$5,516.14 = current total labor/ non-labor**
 - 1. **Geographic BN 0.988136 = \$5,582.369**
 - 2. **Outlier BN 0.948998 = \$5,882.383**
 - 3. **2 Midnight 1.006 = \$5,847.299**
 - 4. **Labor/wage BN 0.999997 = \$5,847.32**



FY 2018 Rate Factors



	Hospital Submitted Quality Data and is a Meaningful EHR User	Hospital Submitted Quality Data and is NOT a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is NOT a Meaningful EHR User
FY 2018 Update Factor	1.0135	1.0135	1.0135	1.0135
FY 2018 MS-DRG Recalibration Budget Neutrality Factor	0.997432	0.997432	0.997432	0.997432
FY 2018 Wage Index Budget Neutrality Factor	1.001148	1.001148	1.001148	1.001148
FY 2018 Reclassification Budget Neutrality Factor	0.988808	0.988808	0.988808	0.988808
FY 2018 Operating Outlier Factor	0.948999	0.948999	0.948999	0.948999
Adjustment for FY 2018 Required under Section 414 of Pub. L. 114-10 (MACRA) and Section 15005 of Pub. L. 114-255	1.004588	1.004588	1.004588	1.004588



FY 2018 Rate Factors Large Urban



	Hospital Submitted Quality Data and is a Meaningful EHR User	Hospital Submitted Quality Data and is NOT a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is NOT a Meaningful EHR User
National Standardized Amount for FY 2018 if Wage Index is Greater Than 1.0000 ;	Labor: \$3,807.12	Labor: \$3,731.05	Labor: \$3,781.76	Labor: \$3,705.70
Labor/Non-Labor Share Percentage (68.3/31.7)	Non-labor: \$1,766.99	Non-labor: \$1,731.69	Non-labor: \$1,755.22	Non-labor: \$1,719.92



FY 2018 Rate Factors Other Urban



	Hospital Submitted Quality Data and is a Meaningful EHR User	Hospital Submitted Quality Data and is NOT a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is a Meaningful EHR User	Hospital Did NOT Submit Quality Data and is NOT a Meaningful EHR User
National Standardized Amount for FY 2018 if Wage Index is less than or Equal to 1.0000;	Labor: \$3,455.95	Labor: \$3,386.90	Labor: \$3,432.93	Labor: \$3,363.88
Labor/Non-Labor Share Percentage (62.0/38.0)	Non-labor: \$2,118.16	Non-labor: \$12,075.84	Non-labor: \$2,104.05	Non-labor: \$2,061.74



IPPS Rate Comparison (w/Quality & MU)



➤ FY 2017	FY 2018	Difference
▪ Large		
\$3,839.23	\$3,807.12	
<u>1,676.91</u>	<u>1,766.99</u>	
\$5,516.14	\$5,574.11	\$57.97/ 1.05%
▪ Other		
\$3,420.01	\$3,455.95	
<u>2,096.13</u>	<u>2,118.16</u>	
\$5,516.14	\$5,574.11	\$57.97/ 1.05%



IPPS Offsets



- **There are other offsets that impact further**
 - **Value-based purchasing**
 - **Readmissions**
 - **HAC**
 - **DSH**



FY 2018 IPPS Rate Changes



- CMS says 103 hospitals are estimated to not receive the full market basket rate-of-increase for FY 2018 because they are identified as **not** meaningful EHR users
- CMS says that 82 hospitals are estimated to not receive the full market basket rate-of-increase for FY 2018 because they **failed the quality** data submission
- CMS says 21 hospitals are estimated to not receive the full market basket rate-of-increase for FY 2018 because they are identified as **both** not meaningful EHR users and do not submit quality data
- These numbers same as proposed?



Documentation & Coding



- **Medicare Access and CHIP Reauthorization Act of 2015 (MACRA)**
 - **Limits CMS reinstatement of offsets**
 - **Offsets 3 years @ 0.8 = 2.4**
 - **FY 2017 @ 1.5 = 1.5**
 - **Total = 3.9 percent to add-back**
- **MARCA = 0.5 percent from FY 2018 through 2023**
 - **Would total 3.0 percent**
 - **Shortfall is 0.9 percent**



Documentation & Coding



- **21st Century Cures Act limits FY 2018 add-back**
- **Reduced FY 2018 from 0.5 to 0.4588**
- **Revised shortfall would now be $[0.9 + .0402 (0.5-0.4588) = 0.0412] = 0.9412 (0.09+.0412)$**



FY 2018 Capital



- Rate would increase from \$446.79 to **\$453.97**
- Comments
 - Why is there still a separate add-on?
 - Why does CMS spend time discussing exceptions that have long “died” off?



Excluded Hospitals



- **Rate will increase to 2.7 percent – full market basket**
- **Affects**
 - **Children's Hospital**
 - **11 Cancer Hospitals**
 - **Hospitals outside 50 states & DC**



FY 2018 Outliers



- **Outlier fixed-loss cost threshold** for FY 2018 equals the prospective payment rate for the DRG, plus any IME and DSH payments, and any add-on payments for new technology, plus **\$26,601**
 - The current amount is \$23,573
 - Proposed was \$26,713
 - Actual FY 2016 was 5.41 percent
 - Proposed was 5.37 percent
 - Why is threshold now less than proposed?



FY 2018 Wage Index



➤ **No new/ additional changes to CBSAs**

- There is a revised OMB Bulletin No 15-01
 - Makes some adjustments 3 areas
 - Petersburg, AK
 - La Salle Parish, LA
 - Shannon County, SD
- CMS will eliminate use of SSA codes and only use Federal Information Processing Standard (FIPS) codes for determining CBSA definitions



FY 2018 Wage Index



- Using info from cost reports in FY 2014
- To use “other” wage related costs, costs ***MUST*** be reported on employees’ or contractors’ W-2 or 1099 forms
- No change to the statewide budget neutrality adjustment factor – federal versus state specific



FY 2018 Wage Index Rural Floor



FY 2018 IPPS Estimated Payments Due to Rural Floor with National Budget Neutrality

State	Number of Hospitals	Number of Hospitals That Would Receive the Rural Floor	Percent Change in Payments due to Application of Rural Floor with Budget Neutrality	Difference (in \$ millions)
California	299	177	1.2	\$134
Massachusetts	57	36	1.3	\$44
New Hampshire	13	9	3.7	\$20
Rhode Island	11	10	5.0	\$19
Delaware	6	6	1.8	\$8



FY 2018 Wage Index Rural Floor



FY 2018 IPPS Estimated Payments Due to Rural Floor with National Budget Neutrality

State	Number of Hospitals	Number of Hospitals That Would Receive the Rural Floor	Percent Change in Payments due to Application of Rural Floor with Budget Neutrality	Difference (in \$ millions)
New York	154	11	-.03	-\$23
Texas	310	4	-0.3	-\$21
Illinois	127	3	-0.4	-\$17
Pennsylvania	150	3	-0.4	-\$17
Florida	171	17	-0.2	-\$15
Michigan	94	0	-0.3	-\$14
Ohio	128	6	-0.3	-\$12
North Carolina	84	0	-0.3	-\$10
Minnesota	49	0	-0.4	-\$8
Missouri	74	0	-0.2	-\$6



FY 2018 Floors



➤ **Frontier Floor**

- Would benefit Montana, North Dakota, South Dakota, and Wyoming, covering 49 providers, would receive a frontier floor value of 1.0000

➤ **Imputed Floor**

- 400 hospitals will receive rural and imputed floors
- CMS has reversed its proposal for following states – now extended
 - 17 providers in New Jersey
 - 10 providers in Rhode Island
 - 6 providers in Delaware



FY 2018 Occupational Mix



- Using FY 2013 survey
- FY 2018 occupational mix adjusted national average hourly wage is **\$42.0564** – current is \$41.0651

Occupational Mix Nursing Subcategory	Average Hourly Wage
National RN	\$38.86637039
National LPN and Surgical Technician	\$22.73227683
National Nurse Aide, Orderly, and Attendant	\$15.95002569
National Medical Assistant	\$17.96799473
National Nurse Category	\$32.856948



FY 2018 Occupational Mix



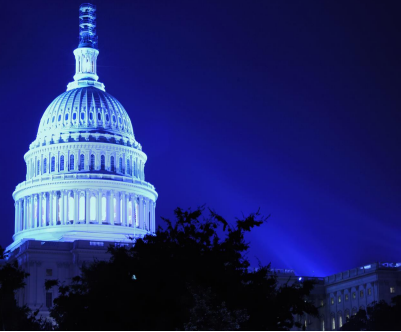
- FY 2019 requires new survey using 2016 data
- Hospitals were required to submit completed 2016 surveys to their MACs by July 3, 2017
- Forms at: <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/Wage-Index-Files-Items/2016-Occupational-Mix-Survey-Hospital-Reporting-Form-CMS-10079-for-the-Wage-Index-Beginning-FY-2019.html>



FY 2018 Reclassifications



- FY 2018 – 374 approved
- FY 2017 – 246 approved
- FY 2016 – 245 approved
- CMS says there are 865 hospitals reclassified for FY 2018
(906 in proposed rule?)
- Applications for FY 2019 to MGCRB due by September 1st



FY 2018 RRCs



- **FY 2018 – Case-Mix**
- **National CMI 1.6638 for FY 2016 cost reporting periods or regional, if lower**

▪ New England (CT, ME, MA, NH, RI, VT)	1.4192
▪ Middle Atlantic (PA, NJ, NY)	1.5133
▪ South Atlantic (DE, DC, FL, GA, MD, NC, SC, VA, WV)	1.5405
▪ East North Central (IL, IN, MI, OH, WI)	1.5896
▪ East South Central (AL, KY, MS, TN)	1.5086
▪ West North Central (IA, KS, MN, MO, NE, ND, SD)	1.6344
▪ West South Central (AR, LA, OK, TX)	1.6950
▪ Mountain (AZ, CO, ID, MT, NV, NM, UT, WY)	1.7580
▪ Pacific (AK, CA, HI, OR, WA)	1.6473



RRCs continued



- **FY 2017 – Discharges – 5,000**
 - **National or regional, if lower**
 - **None Lower**



MDH/ SCH/ Low-Volume



- **MDH program terminates 9/30/2017 would move to IPPS Federal Rate**
- **SCH can qualify for volume decrease adjustment – must submit info to their MACs**
- **CMS says there are:**
 - 243 RRCs ??
 - 317 SCHs
 - 129 both RRC and SCH
 - 96 MDHs will lose status -- overall decrease in payments of approximately \$119 million



Low-Volume Hospitals



- **Beginning with FY 2018, the preexisting low-volume hospital payment adjustment and qualifying criteria, as implemented in FY 2005 will resume**
 - Hospital must be 25 miles
 - Hospital must have 200 or fewer beds
 - Hospital must make a written request to its MAC no later than September 1, 2017



Redesignations



- **“Lugar” Hospitals – by statute**
 - List available on the CMS Web site
 - Clarifying can “simultaneously seek urban to rural classification” (can keep MGCRB and Lugar status)
- **Out-Migration Adjustment**
 - Can seek urban wage index
 - Now part of table 2

Postacute Care Transfers



- **CMS has identified 3 MS-DRGs** to be included on the list of MS-DRGs subject to the special payment transfer policy
 - MS-DRGs 987, 988, and 989



IME / GME



- **IME multiplier unchanged at 1.35 – by law**



MS-DRGs





MS-DRGs



➤ Examples of changes:

- **Functional Quadriplegia** -- reassign cases identified by diagnosis code R53.2 from MS-DRGs 052 and 053 to MS-DRGs 091, 092, and 093 for FY 2018
- **Responsive Neurostimulator (RNS©) System** -- reassign all cases with a principal diagnosis of epilepsy and one of the following ICD-10-PCS code combinations capturing cases with the neurostimulator generators inserted into the skull (including cases involving the use of the RNS© neurostimulator), to MS-DRG 023, even if there is no MCC reported:
 - 0NH00NZ (Insertion of neurostimulator generator into skull, open approach), in combination with 00H00MZ (Insertion of neurostimulator lead into brain, open approach);
 - 0NH00NZ (Insertion of neurostimulator generator into skull, open approach), in combination with 00H03MZ (Insertion of neurostimulator lead into brain, percutaneous approach); and
 - 0NH00NZ (Insertion of neurostimulator generator into skull, open approach), in combination with 00H04MZ (Insertion of neurostimulator lead into brain, percutaneous endoscopic approach).

MS-DRGs



➤ Examples of changes:

- **Responsive Neurostimulator (RNS©) System_** – would change title of MS-DRG 023 from “Craniotomy with Major Device Implant or Acute Complex Central Nervous System (CNS) Principal Diagnosis (PDX) with MCC or Chemo Implant” to “Craniotomy with Major Device Implant or Acute Complex Central Nervous System (CNS) Principal Diagnosis (PDX) with MCC or Chemotherapy Implant or Epilepsy with Neurostimulator” to reflect the proposed modifications to MS-DRG assignments
- **Precerebral Occlusion or Transient Ischemic Attack with Thrombolytic** – would add ICD-10-CM diagnosis codes that are currently assigned to MS-DRGs 067 and 068 and the ICD-10-CM diagnosis codes to MS-DRG 069 to the GROUPER logic for MS-DRGs 061, 062, and 063 when those conditions are sequenced as the principal diagnosis and reported with an ICD-10-PCS procedure code describing use of a thrombolytic agent (for example, tPA). Would retitle MS-DRGs 061, 062, and 063 as “Ischemic Stroke, Precerebral Occlusion or Transient Ischemia with Thrombolytic Agent with MCC, with CC and without CC/MCC”, respectively, and to retitle MS-DRG 069 as “Transient Ischemia without Thrombolytic”.



MS-DRGs



➤ Examples of changes:

- **Swallowing Eye Drops (Tetrahydrozoline)**
- **Percutaneous Cardiovascular Procedures and Insertion of a Radioactive Element**
- **Proposed Modification of the Titles for MS-DRG 246 (Percutaneous Cardiovascular Procedures with Drug-Eluting Stent with MCC or 4+ Vessels or Stents) and MS-DRG 248 (Percutaneous Cardiovascular Procedures with Non-Drug-Eluting Stent with MCC or 4+ Vessels or Stents)**
- **Mitral Valve Replacement Procedures**
- **Total Ankle Replacement (TAR) Procedures**
- **Combined Anterior/Posterior Spinal Fusion**
- **MS-DRG 782 (Other Antepartum Diagnoses without Medical Complications)**
- **Shock During or Following Labor and Delivery**
- **MDC 15 (Newborns and Other Neonates with Conditions Originating in Perinatal Period): Observation and Evaluation of Newborn**



MS-DRGs



- **Changes to the Medicare Code Editor (MCE)**
- **Changes to Surgical Hierarchies**
- **Operating Room (OR) and non OR issues**
 - identified more than 800 code changes in 45 categories. Many are reflected in the rule's tables 6P4a through 6P4p. These tables are on the CMS web.



MS-DRGs



- **Replaced Devices Offered without Cost or with a Credit**
 - **Not adding any MS-DRGs to its policy without cost or with credit**



MS-DRG Changes



LIST OF MEDICARE SEVERITY DIAGNOSIS-RELATED GROUPS (MS-DRGS)

RELATIVE WEIGHTING FACTORS

MS-DRG	MS-DRG Title	FY 2018 Weights	Final FY 2017 Weights	Percentage Change
69	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W CC OR TPA IN 24 HRS	1.0313	1.0431	-1.18%
189	PULMONARY EDEMA & RESPIRATORY FAILURE	1.2198	1.2135	0.63%
190	CHRONIC OBSTRUCTIVE PULMONARY DISEASE W MCC	1.1528	1.1481	0.47%
193	SIMPLE PNEUMONIA & PLEURISY W MCC	1.3733	1.3860	-1.27%
194	SIMPLE PNEUMONIA & PLEURISY W CC	0.9333	0.9469	-1.36%
291	HEART FAILURE & SHOCK W MCC	1.4761	1.4796	-0.35%
292	HEART FAILURE & SHOCK W CC	0.9589	0.9574	0.15%
378	G.I. HEMORRHAGE W CC	0.9704	0.9860	-1.56%



MS-DRG Changes



LIST OF MEDICARE SEVERITY DIAGNOSIS-RELATED GROUPS (MS-DRGS), RELATIVE WEIGHTING FACTORS—FY 2018 Proposed Rule

MS-DRG	MS-DRG Title	Proposed FY 2017 Weights	Final FY 2016 Weights	Percentage Change
392	ESOPHAGITIS, GASTROENT & MISC DIGEST DISORDERS W/O MCC	0.7594	0.7402	1.92%
470	MAJOR JOINT REPLACEMENT OR REATTACHMENT OF LOWER EXTREMITY W/O MCC	2.0522	2.0671	-1.49%
603	CELLULITIS W/O MCC	0.8503	0.8445	0.58%
682	RENAL FAILURE W MCC	1.4845	1.4989	-1.44%
683	RENAL FAILURE W CC	0.9293	0.9191	1.02%
690	KIDNEY & URINARY TRACT INFECTIONS W/O MCC	0.7946	0.7777	1.69%
871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	1.8231	1.7660	5.71%
872	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W/O MCC	1.0547	1.0283	2.64%



MS-DRG Changes



- 16 above MS-DRGs account for 3.2 million discharges
- Total discharges = 9.5 million
- Result 16 = 33 percent



New Technology Add-ons



➤ For FY 2018 discontinuing :

- CardioMEMS™ HF (Heart Failure) Monitoring System
- Lutonix® Drug Coated Balloon PTA Catheter and In.PACT™ Admiral™ Paclitaxel Coated Percutaneous Transluminal (PTA) Balloon Catheter
- MAGEC® Spinal Bracing and Distraction System (MAGEC® Spine)
- Blinatumomab (BLINCYTO®)



New Technology Add-ons



➤ For FY 2018 continuing :

- Defitelio® (Defibrotide). The maximum payment will remain at \$75,900.
- GORE® EXCLUDER® Iliac Branch Endoprosthesis (IBE). The maximum payment will remain at \$5,250.
- Praxbind® Idarucizumab. The maximum payment for a case involving Idarucizumab will remain at \$1,750
- Vistogard™ (Uridine Triacetate). The maximum payment for a case involving the Vistogard™ will remain at \$37,500 for FY 2018.



New Technology Add-ons



➤ For FY 2018 3 new:

- Bezlotoxumab (ZINPLAVA™) – Cases involving ZINPLAVA™ that are eligible for new technology add-on payments will be identified by ICD–10–PCS procedure codes XW033A3 and XW043A3. The maximum new technology add-on payment amount for a case involving the use of ZINPLAVA™ is \$1,900
- EDWARDS INTUITY Elite™ Valve System (INTUITY) and LivaNova Perceval Valve (Perceval) Ustekinumab (Stelara®) - The maximum new technology add-on payment amount for a case involving the INTUITY or Perceval valves is \$6,110.23 for FY 2018.
- c. Ustekinumab (Stelara®) - Cases involving Stelara® that are eligible for new technology add-on payments will be identified by ICD–10–PCS procedure code XW033F3 (Introduction of other New Technology therapeutic substance into peripheral vein, percutaneous approach, New Technology Group 3). The maximum new technology add-on payment amount for a case involving the use of STELARA™ is \$2,400



New Technology Add-ons



➤ **Comment**

- Extensive dialogue
- More like a proposal than a rule



IPPS DSH Formula





IPPS DSH Formula



- Mandated by Section 3133 of ACA
- Splits system
 - 25 percent remains as old formula
 - 75 percent new
 - Uses 3 factors



IPPS DSH Formula



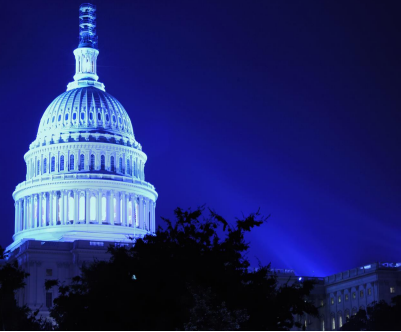
- CMS says it will distribute **\$6.767** billion in uncompensated care payments in FY 2018, *an increase of approximately \$1.0 billion from the FY 2017 amount* (factor 2 monies)
- This change reflects CMS' adoption to incorporate data from its National Health Expenditure Accounts into the estimate of the percent change in the rate of uninsurance, which is used in calculating the total amount of uncompensated care payments available to be distributed



DSH Factor One



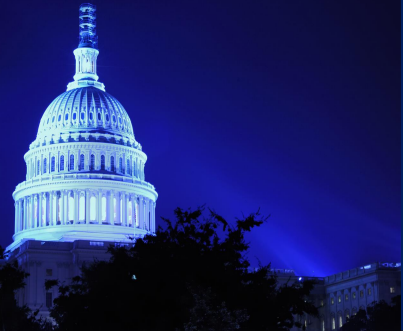
- Determines 75 percent of what would have been paid under the old methodology
- Excluded hospitals
 - MD waiver
 - SCHs paid on a hospital-specific basis
 - Hospitals in Rural Community Demo



DSH Factor One



- The June 2017 **Office of the Actuary** estimate for Medicare DSH payments for FY 2018, without regard to the application of section 1886(r)(1) of the Act, is approximately **\$15.533 billion**
 - Amount proposed based on January estimate was \$16.003 billion
- The estimate for empirically justified Medicare DSH payments for FY 2018, with the application of section 1886(r)(1) of the Act, is approximately **\$3.888 billion** (or 25 percent of the total amount of estimated Medicare DSH payments for FY 2018)
- **Factor One is \$11,664,704,633.27**
 - **(\$15.533-\$3.888=\$11.645)**



DSH Factor One



- [Current Factor 1 for FY 2017 is **\$10,797,476,782.62**, which is equal to 75 percent of the total amount of estimated Medicare DSH payments for FY 2017 (\$14,396,635,710.16 minus \$3,599,158,927.54)]



DSH Factor Two



- Reduces Factor One amount by percentage reduction in **uninsured**
- The calculation of the Factor 2 for FY 2018 using a weighted average of OACT's projections for CY 2017 and CY 2018 is as follows:
 - Percent of individuals without insurance for CY 2013: 14 percent.
 - Percent of individuals without insurance for CY 2017: 8.3 percent.
 - Percent of individuals without insurance for CY 2018: 8.1 percent.
 - Percent of individuals without insurance for FY 2018 (0.25 times 0.083) + (0.75 times 0.081): 8.15 percent



DSH Factor Two



- Formula;
 - $1 - |((0.0815 - 0.14) / 0.14)| = 1 - 0.4179 = 0.5821$ (58.21 percent)
 - 0.5821 (58.21 percent) - .002 (**0.2 percentage points** for FY 2018 under section 1886(r)(2)(B)(ii) of the Act) = 0.5801 or 58.01 percent
- **Factor 2 = 58.01**
 - 0.7619 = was Factor 2 for FY 2015
 - 0.6369 = was Factor 2 for FY 2016
 - 0.5674 = is current FY 2017 Factor 2
 - 0.5801 = will be FY 2018
 - The increase of FY 2018 over FY 2017 is what fuels DSH increase



DSH Factor Two



➤ Formula;

- By law, the current 0.1 percentage reduction increases to 0.2 for FY 2018



DSH Factor Two



- The amount available for uncompensated care payments for FY 2018 will be **\$6,766,695,163.56**
 - $(\$11,664,704,643.27 \times 0.5801 = \$6,766,695,163.56.$
 - The FY 2014 “pool” was \$9.033 billion
 - The FY 2015 “pool” was \$7.648 billion
 - The FY 2016 “pool” was \$6.406 billion
 - The FY 2017 “pool” is \$6.054 billion
 - The FY 2108 “pool” is \$6.767 billion



DSH Factor Three



- Factor 3 is “equal to the percent, for each subsection (d) hospital, that
- represents the quotient of (i) the amount of uncompensated care for such hospital for a period selected by the Secretary (as estimated by the Secretary, based on appropriate data (including, in the case where the Secretary determines alternative data is available which is a better proxy for the costs of subsection (d) hospitals for treating the uninsured, the use of such alternative data)); and (ii) the aggregate amount of uncompensated care for all subsection (d) hospitals that receive a payment under this subsection for such period (as so estimated, based on such data)”
- Based on each hospital’s share of total uncompensated care costs across all PPS hospitals that received DSH payments
 - So the numerator is all PPS hospitals, but denominator is just DSH hospitals



DSH Factor Three & S-10



- For FY 2018, CMS will begin incorporating uncompensated care cost data from **Worksheet S-10** of the Medicare cost report in the methodology for distributing these funds
- Specifically, for FY 2018, CMS will use Worksheet S-10 data from FY 2014 cost reports in combination with insured low income days data from the two preceding cost reporting periods to determine **the distribution** of uncompensated care payments



DSH Factor Three & S-10



- **CMS computed Factor 3 for each hospital by—**
- Step 1: Calculating Factor 3 using the low-income insured days proxy based on FY 2012 cost report data and the FY 2014 SSI ratio;
 - Step 2: Calculating Factor 3 using the insured low-income days proxy based on FY 2013 cost report data and the FY 2015 SSI ratio;
 - Step 3: Calculating Factor 3 based on the FY 2014 Worksheet S-10 data, and
 - Step 4: Averaging the Factor 3 values from Steps 1, 2, and 3; that is, adding the Factor 3 values from FY 2012, FY 2013, and FY 2014 for each hospital, and dividing that amount by the number of cost reporting periods with data to compute an average Factor 3.



Worksheet S-10



- Controversy exists on S-10 accuracy, etc.
- **Narrow window to correct certain S-10 data**
 - “For revisions to be considered, hospitals must submit their amended FY 2014 cost report containing the revised Worksheet S-10 (or a completed Worksheet S-10 if no data were included on the previously submitted cost report) to the MAC no later than **September 30, 2017**”



Readmissions, HVBP, HAC and Quality





Readmissions



- The Hospital Readmissions Reduction Program currently includes the following six applicable conditions:
 - acute myocardial infarction (AMI);
 - heart failure (HF);
 - pneumonia (PN);
 - total hip arthroplasty/total knee arthroplasty (THA/TKA);
 - chronic obstructive pulmonary disease (COPD); and
 - coronary Artery Bypass Graft (CABG) Surgery



Readmissions



- CMS will assess penalties based on a hospital's performance relative to other hospitals with a similar proportion of patients who are dually eligible for Medicare and full-benefit Medicaid. Specifically, CMS is adopting the following:
 - A methodology for calculating the proportion of dual-eligible patients;
 - A methodology for assigning hospitals to peer groups; and
 - A payment adjustment formula calculation methodology.



Readmissions



- **Aggregate payments for excess readmissions** = [sum of base operating DRG payments for **AMI** x (Excess Readmissions Ratio for AMI-1)] + [sum of base operating DRG payments for **HF** x (Excess Readmissions Ratio for HF-1)] + [sum of base operating DRG payments for **PN** x (Excess Readmissions Ratio for **PN-1**)] + [sum of base operating DRG payments for **COPD** x (Excess Readmissions Ratio for COPD-1)] + [sum of base operating DRG payments for **THA/TKA** x (Excess Readmissions Ratio for THA/TKA-1)] + [sum of base operating DRG payments for **CABG** x (Excess Readmissions Ratio for CABG-1)]
- **Aggregate payments for all discharges** = sum of base operating DRG payments for all discharges



Readmissions



- Ratio = $1 - (\text{Aggregate payments for excess readmissions} / \text{Aggregate payments for all discharges})$
- **Readmissions Adjustment Factor for FY 2018 is the higher of the ratio or 0.9700**
 - **Maximum reduction = 3 percent**
- **CMS estimate that 2,577 hospitals will be impacted**
- **Impact expected to be \$556 million a \$24 million increase over FY 2017**



Value Based Purchasing



- **Withhold amount will be 2.0 percent for all hospitals**
- Total amount available for performance-based incentive payments for FY 2018 will be approximately \$1.9 billion
- Supposed to be budget neutral



Value Based Purchasing



- Will remove the current 8-indicator Patient Safety for Selected Indicators (PSI 90) measure from the Safety domain beginning with the FY 2019 program year;
- Will adopt the 10-indicator modified Patient Safety and Adverse Events Composite PSI 90 measure beginning in the FY 2023 program year;
- Will adopt the Hospital-Level, Risk-Standardized Payment Associated with a 30-day Episode of Care for Pneumonia measure for the Efficiency and Cost Reduction domain beginning with the FY 2022 program year; and
- Will revise the Efficiency and Cost Reduction domain weighting beginning with the FY 2021 program year to reflect the implementation of condition-specific payment measures in the Hospital VBP Program.



HAC Reduction



- **Lowest-performing quartile get 1.0 percent reduction**
- CMS is finalizing 2 changes:
 - Specifying the dates of the data period used to calculate hospital performance for the FY 2020 HAC Reduction Program; and
 - Updating the Extraordinary Circumstance Exception policy.



Quality





Quality



- The section on Quality Reporting extends more than 730 page
- For FY 2017 had finalized 62 measures for FY 2019 payment



Inpatient Quality Reporting



- Replacing the pain management questions on the Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS) Survey (NQF #0166) Measure for the FY 2020 Payment Determination and Subsequent Years
- Updating the Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) following Acute Ischemic Stroke Hospitalization Measure for the FY 2023 Payment Determination and Subsequent Years
- Adopting a voluntary reporting of one new measure, the Hybrid Hospital-Wide Readmission Measure with Claims and Electronic Health Record Data, for the CY 2018 reporting period



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Healthcare-Associated Infection Measures		
CAUTI	National Healthcare Safety Network (NHSN) Catheter-associated Urinary Tract Infection (CAUTI) Outcome Measure	0138
CDI	National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Clostridium difficile Infection (CDI) Outcome Measure	1717
CLABSI	National Healthcare Safety Network (NHSN) Central Line-Associated Bloodstream Infection (CLABSI) Outcome Measure	0139
Colon and Abdominal Hysterectomy SSI	American College of Surgeons – Centers for Disease Control and Prevention (ACS-CDC) Harmonized Procedure Specific Surgical Site Infection (SSI) Outcome Measure	0753
HCP	Influenza Vaccination Coverage Among Healthcare Personnel	0431
MRSA Bacteremia	National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Methicillin- resistant Staphylococcus aureus (MRSA) Bacteremia Outcome Measure	1716



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Claims-based Patient Safety Measures		
Hip/knee complications	Hospital-Level Risk-Standardized Complication Rate (RSCR) Following Elective Primary Total Hip Arthroplasty (THA) and/or Total Knee Arthroplasty (TKA)	1550
PSI 04	Death among Surgical Inpatients with Serious, Treatable Complications	0351
PSI 90	Patient Safety for Selected Indicators (Composite Measure), Modified PSI 90 (Updated Title: Patient Safety and Adverse Events Composite)	0531



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Claims-based Mortality Outcome Measures		
MORT-30-AMI	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Acute Myocardial Infarction (AMI) Hospitalization	0230
MORT-30-CABG	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Coronary Artery Bypass Graft (CABG) Surgery	2558
MORT-30-COPD	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Chronic Obstructive Pulmonary Disease (COPD) Hospitalization	1893
MORT-30-HF	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Heart Failure (HF) Hospitalization	0229
MORT-30-PN	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate Following Pneumonia Hospitalization	0468
MORT-30-STK	Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate Following Acute Ischemic Stroke*	N/A



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Claims-based Coordination of Care Measures		
READM-30-AMI	Hospital 30-Day All-Cause Risk-Standardized Readmission Rate (RSRR) Following Acute Myocardial Infarction (AMI) Hospitalization	0505
READM-30-CABG	Hospital 30-Day, All-Cause, Unplanned, Risk- Standardized Readmission Rate (RSRR) Following Coronary Artery Bypass Graft (CABG) Surgery	2515
READM-30-COPD	Hospital 30-Day, All-Cause, Unplanned, Risk- Standardized Readmission Rate (RSRR) Following Coronary Artery Bypass Graft (CABG) Surgery	1891
READM-30-HF	Hospital 30-Day, All-Cause, Risk-Standardized Readmission Rate (RSRR) Following Heart Failure (HF) Hospitalization	0330
READ-30-HWR	Hospital-Wide All-Cause Unplanned Readmission Measure (HWR)	1789
READM-30-PN	Hospital 30-Day, All-Cause, Risk-Standardized Readmission Rate (RSRR) Following Pneumonia Hospitalization	0506
READM-30-STK	30-Day Risk Standardized Readmission Rate Following Stroke Hospitalization	N/A



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Claims-based Coordination of Care Measures - continued		
READM-30-THA/TKA	Hospital-Level 30-Day, All-Cause Risk-Standardized Readmission Rate (RSRR) Following Elective Primary Total Hip Arthroplasty (THA) and/or Total Knee Arthroplasty (TKA)	1551
AMI Excess Days	Excess Days in Acute Care after Hospitalization for Acute Myocardial Infarction	2881
HF Excess Days	Excess Days in Acute Care after Hospitalization for Heart Failure	2880
PN Excess Days	Excess Days in Acute Care after Hospitalization for Pneumonia	2882



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Claims-based Payment Measures		
AMI Payment	Hospital-Level, Risk-Standardized Payment Associated with a 30-Day Episode-of-Care for Acute Myocardial Infarction (AMI)	2431
HF Payment	Hospital-Level, Risk-Standardized Payment Associated with a 30-Day Episode-of-Care For Heart Failure (HF)	2436
PN Payment	Hospital-Level, Risk-Standardized Payment Associated with a 30-day Episode-of-Care For Pneumonia	2579
THA/TKA Payment	Hospital-Level, Risk-Standardized Payment Associated with an Episode-of-Care for Primary Elective Total Hip Arthroplasty and/or Total Knee Arthroplasty	N/A
MSPB	Payment-Standardized Medicare Spending Per Beneficiary (MSPB)	2158
Cellulitis Payment	Cellulitis Clinical Episode-Based Payment Measure	N/A
GI Payment	Gastrointestinal Hemorrhage Clinical Episode-Based Payment Measure	N/A



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years

Short Name	Measure Name	NQF #
Claims-based Payment Measures -continued		
Kidney/UTI Payment	Kidney/Urinary Tract Infection Clinical Episode- Based Payment Measure	N/A
AA Payment	Aortic Aneurysm Procedure Clinical Episode-Based Payment Measure	N/A
Chole and CDE Payment	Cholecystectomy and Common Duct Exploration Clinical Episode-Based Payment Measure	N/A
Sfusion Payment	Spinal Fusion Clinical Episode-Based Payment Measure	N/A



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years

Short Name	Measure Name	NQF #
Chart-abstracted Clinical Process of Care Measures		
ED-1**	Median Time from ED Arrival to ED Departure for Admitted ED Patients	0495
ED-2**	Admit Decision Time to ED Departure Time for Admitted Patients	0497
Imm-2	Influenza Immunization	1659
PC-01**	Elective Delivery (Collected in aggregate, submitted via Web-based tool or electronic clinical quality measure)	0469
Sepsis	Severe Sepsis and Septic Shock: Management Bundle (Composite Measure)	0500
VTE-6	Incidence of Potentially Preventable Venous Thromboembolism	+



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
EHR-based Clinical Process of Care Measures (that is, Electronic Clinical Quality Measure (eCQMs))		
AMI-8a	Primary PCI Received Within 90 Minutes of Hospital Arrival	+
CAC-3	Home Management Plan of Care Document Given to Patient/Caregiver	+
ED-1**	Median Time from ED Arrival to ED Departure for Admitted ED Patients	0495
ED-2**	Admit Decision Time to ED Departure Time for Admitted Patients	0497
EHDI-1a	Hearing Screening Prior to Hospital Discharge	1354
PC-01**	Elective Delivery (Collected in aggregate, submitted via Web-based tool or electronic clinical quality measure)	0469
PC-05	Exclusive Breast Milk Feeding***	0480
STK-02	Discharged on Antithrombotic Therapy	0435



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
EHR-based Clinical Process of Care Measures (that is, Electronic Clinical Quality Measure (eCQMs))		
AMI-8a	Primary PCI Received Within 90 Minutes of Hospital Arrival	+
CAC-3	Home Management Plan of Care Document Given to Patient/Caregiver	+
ED-1**	Median Time from ED Arrival to ED Departure for Admitted ED Patients	0495
ED-2**	Admit Decision Time to ED Departure Time for Admitted Patients	0497
EHDI-1a	Hearing Screening Prior to Hospital Discharge	1354
PC-01**	Elective Delivery (Collected in aggregate, submitted via Web-based tool or electronic clinical quality measure)	0469
PC-05	Exclusive Breast Milk Feeding***	0480
STK-02	Discharged on Antithrombotic Therapy	0435



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
EHR-based Clinical Process of Care Measures (that is, Electronic Clinical Quality Measure (eCQMs) - continued		
STK-03	Anticoagulation Therapy for Atrial Fibrillation/Flutter	0436
STK-05	Antithrombotic Therapy by the End of Hospital Day Two	0438
STK-06	Discharged on Statin Medication	0439
STK-08	Stroke Education	+
STK-10	Assessed for Rehabilitation	0441
VTE-1	Venous Thromboembolism Prophylaxis	0371
VTE-2	Intensive Care Unit Venous Thromboembolism Prophylaxis	0372



Inpatient Quality Reporting



Previously Adopted Hospital IQR Program Measures for the FY 2020 Payment Determination and Subsequent Years		
Short Name	Measure Name	NQF #
Patient Experience of Care Survey Measures		
HCAHPS	HCAHPS*** + 3-Item Care Transition Measure (CTM-3)	0166 0228
Structural Patient Safety Measures		
Patient Safety Culture	Hospital Survey on Patient Safety Culture	NA
Safe Surgery Checklist	Safe Surgery Checklist Use	NA

*Measure refinement of the Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate Following Acute Ischemic Stroke, for the FY 2023 payment determination and for subsequent years, as described in section IX.A.6.b. of the preamble of this final rule.

** Measure listed twice, as both chart-abstracted and electronic clinical quality measure.

*** Measure refinement of the HCAHPS measure's Pain Management questions for the FY 2020 payment determination and for subsequent years, as described in section IX.A.6.a. of the preamble of this final rule.

+ NQF endorsement has been removed.



Changes to Clinical Quality Measures (CQMs)



- For Calendar Year (CY) 2017;
 - Reporting period: For eligible hospitals and CAHs reporting CQMs electronically that demonstrate meaningful use for the first time in 2017 or that have demonstrated meaningful use in any year prior to 2017, the reporting period will be one self-selected quarter of CQM data in CY 2017
 - CQMs: If an eligible hospital or CAH is only participating in the EHR Incentive Program or is participating in both the EHR Incentive Program and the Hospital IQR Program, the eligible hospital or CAH will report on at least four (self-selected) of the available CQMs
- For CY 2018;
 - Reporting period: For eligible hospitals and CAHs reporting CQMs electronically that demonstrate meaningful use for the first time in 2018 or that have demonstrated meaningful use in any year prior to 2018, the reporting period will be one self-selected quarter of CQM data in CY 2018. For the Medicare EHR Incentive Program only, the submission period for reporting CQMs electronically will be the two months following the close of the calendar year, ending February 28, 2019
 - CQMs: For eligible hospitals and CAHs participating only in the EHR Incentive Program or is participating in both the EHR Incentive Program and the Hospital IQR Program, the eligible hospital or CAH will report on at least four (self-selected) of the available CQMs



Changes to Clinical Quality Measures (CQMs)



- For CY 2018;
 - For eligible hospitals and CAHs that report CQMs by attestation under the Medicare EHR Incentive Program as a result of electronic reporting not being feasible and for eligible hospitals and CAHs that report CQMs by attestation under their State's Medicaid EHR Incentive Program, they are required to report on all 16 available CQMs for the full CY 2018 (consisting of four quarterly data reporting periods). CMS has established an exception to this full-year reporting period for eligible hospitals and CAHs demonstrating meaningful use for the first time under their State's Medicaid EHR Incentive Program. Under this exception, the CQM reporting period is any continuous 90-day period within CY 2018
- Additionally, for the eligible professionals (EPs) in the Medicaid EHR Incentive Program, CMS is finalizing the following changes:
 - Reporting Periods: For 2017, CMS is modifying the CQM reporting period for EPs in the Medicaid EHR Incentive Program to be a minimum of a continuous 90-day period during calendar year 2017
 - CQMs: For 2017, CMS is aligning the specific CQMs available to EPs participating in the Medicaid EHR Incentive Program with those available to professionals participating in the Merit-based Incentive Payment System



PPS Exempt Cancer Hospital Quality Reporting



➤ **Adding 4 measures that assess end-of-life care:**

- Proportion of Patients Who Died from Cancer Receiving Chemotherapy in the Last 14 Days of Life (NQF #0210);
- Proportion of Patients Who Died from Cancer Admitted to the ICU in the Last 30 Days of Life (NQF #0213);
- Proportion of Patients Who Died from Cancer Not Admitted to Hospice (NQF #0215);
and
- Proportion of Patients Who Died from Cancer Admitted to Hospice for Less than Three Days (NQF #0216).



Long Term Care Hospital Quality Reporting Program (LTCH QRP)



- **The LTCH QRP currently has 17 adopted measures**
- CMS is finalizing the replacement of the current pressure ulcer measure with an updated version of that measure, as well as adopt two new companion measures (one process and one outcome) related to ventilator weaning, beginning with the FY 2020 LTCH QRP.
- These measures are:
 - Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury
 - Compliance with Spontaneous Breathing Trial (SBT) by Day 2 of the LTCH Stay
 - Ventilator Liberation Rate



Inpatient Psychiatric Facility Quality Reporting Program



- The current IPFQR Program includes 18 mandatory measures.
- CMS is not finalizing the Medication Continuation following Inpatient Psychiatric Discharge measure
- CMS is updating the IPFQR Program's extraordinary circumstances exception (ECE) policy to align with other CMS programs' ECE provisions
- CMS is also changing the annual data submission timeframes for Notices of Participation (NOP) and withdrawals from the Program and its policy to provide precise dates defining the end of the data submission period
- CMS is adopting factors by which it would evaluate measures to be removed from or retained in the IPFQR Program.



Inpatient Psychiatric Facility Quality Reporting Program



➤ **Proposing:**

- One additional measure Medication Continuation following Inpatient Psychiatric Discharge, which is calculated from claims data.
- Updating the IPFQR Program's extraordinary circumstances exception (ECE) policy to align with other programs' ECE provisions
- Changing how the annual data submission period is specified in order to align the end of this period with the deadline for submitting a Notice of Participation (NOP) or withdrawing from the program.
- Factors by which CMS would evaluate measures to be removed from or retained in the IPFQR Program.





LTCHs



- MACRA sets update at 1.00 percent
- Area wage factor = 1.0006434
- Budget neutrality = 0.9651
- Results in Federal rate of **\$41,430.56**
 - Current is \$42,476.41
 - (calculated as \$42,476.41 (FY 2017 rate) X 1.01 x 1.0006434 X 0.9651)
 - Labor share will be 66.2 percent
- HCO Threshold -- \$27,382; standard; \$26,601 site neutral
 - 58% non site neutral; 42% site neutral



Questions

