

“A Knowledgeable and Compassionate partner”



SNFVBP: A Deeper Dive

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APPROVAL STATEMENT DISCLOSURE

- This nursing continuing professional development activity was approved by Broad River Rehab, an accredited approver by the American Nurses Credentialing Center's Commission on Accreditation.
- This course has been approved for 1.5 contact hours.

CONFLICT OF INTEREST DISCLOSURE

- Broad River Rehab is not charging for this educational offering and has no financial or other conflicts of interest regarding this program.

SUCCESSFUL COMPLETION REQUIREMENTS

- **Live, in-person**
 - In order to obtain nursing contact hours, you must attend the entire activity, participate in case study analysis, and complete the evaluation.
- **Live, virtual**
 - In order to obtain nursing contact hours, you must participate in the entire program, participate in audience polling and/or Q&A and complete the evaluation.
- **Web-Based/On-Demand**
 - In order to obtain nursing contact hours, you must view the entire program, and complete the evaluation.

DISCLOSURE OF THE EXPIRATION DATE FOR AWARDING CONTACT HOURS FOR ENDURING PROGRAMS

- Contact hours for this program will not be awarded after November 19, 2023



Learning Objectives

SNFVBP: A Deeper Dive

- Understand an overview of SNF VBP SNF VBP Measures
- Comprehend the current SNF VBP measures
- Ascertain the SNF VBP Scoring Methodology
- Know how to apply the health equity adjustment
- Participate in a Q&A session

SNF QRP/VBP Resources

- [SNF QRP](#)
- [SNF VBP](#)
- [SNF QRP Technical Specifications V5.0](#)
- [HAI Draft Specifications](#)
- [Claims Based Measures DTC and PPR](#)
- [MDS 3.0 v1.18.11 Data Sets and Manual](#)
- [FY 2024 final Rule](#)

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing in a nutshell**

- The Centers for Medicare & Medicaid Services (CMS) awards incentive payments to skilled nursing facilities (SNFs) through the SNF VBP Program to encourage SNFs to improve the quality of care they provide to Medicare beneficiaries. Performance in the SNF VBP Program is currently based on a single measure of all-cause hospital readmissions.
- In Section 215 of the Protecting Access to Medicare Act of 2014 (PAMA), Congress added sections 1888(g) and (h) to the Social Security Act, which required the Secretary of the Department of Health and Human Services (HHS) to establish a SNF VBP Program. The Program began affecting SNF payments on October 1, 2018.
- PAMA specifies that under the SNF VBP Program, SNFs:
 - Are evaluated by their performance on a hospital readmission measure;
 - Are assessed on both improvement and achievement, and scored on the higher of the two;
 - Receive quarterly confidential feedback reports containing information about their performance; and
 - Earn incentive payments based on their performance.
- All SNFs paid under Medicare's SNF Prospective Payment System (PPS) are included in the SNF VBP Program. Inclusion in the SNF VBP Program does not require any action on the part of SNFs.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing in a nutshell**

- As required by statute, CMS withholds 2% of SNFs' Medicare fee-for-service (FFS) Part A payments to fund the program. This 2% is referred to as the "withhold".
- CMS is required to redistribute between 50% and 70% of this withhold to SNFs as incentive payments. CMS currently redistributes 60% of the withhold to SNFs as incentive payments, and the remaining 40% of the withhold is retained in the Medicare Trust Fund.
- In Section 111 of the Consolidated Appropriations Act, 2021, Congress amended Section 1888(h) of the Social Security Act to allow the HHS Secretary to apply up to nine additional measures to the SNF VBP Program for payments for services furnished on or after October 1, 2023 (FY 2024). Eight additional measures have been approved so far.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **The 8 Value Based Purchasing Measures (2028)**

- NQF 2510: Skilled Nursing Facility Readmission Measure (SNFRM) Current
- Skilled Nursing Facility (SNF) Healthcare Associated Infections (HAI) Requiring Hospitalization FY 2026
- Total Nursing Hours per Resident Day Staffing (Total Nurse Staffing) measure FY 2026
- Discharge to Community (DTC) FY 2027
- Nursing Staff Turnover Measure FY 2026
- Long Stay Hospitalization Measure per 1000 long-stay resident days FY 2027
- Discharge Function Score measure FY 2027
- Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay) FY 2027
- Skilled Nursing Facility Within Stay Potentially Preventable Readmissions (SNF WS PPR) FY 2028

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measure**

- NQF 2510: Skilled Nursing Facility Readmission Measure (SNFRM)

- The SNFRM measures the rate of all-cause, unplanned hospital readmissions for SNF residents within 30 days of discharge from a prior hospital stay. The SNFRM is risk adjusted for patient demographics, comorbidities, and other health status variables that affect the probability of a hospital readmission, including diagnoses of COVID-19.

- 1 year **baseline period**: FY 2019 (October 1, 2018 through September 30, 2019)

- 1 year **performance period**: FY 2022 (October 1, 2021 through September 30, 2022)

- In response to the COVID-19 PHE, CMS excluded qualifying claims in the first two quarters of CY 2020 (January 1, 2020 – June 30, 2020) from use in the SNF VBP Program. Thus, the baseline periods for the FY 2024 and FY 2025 Program years remained FY 2019 and were not advanced by one year to avoid any use of the excluded qualifying claims.

- **Achievement Threshold: 0.79271, Benchmark: 0.83033**

- **Program year impact**: Current

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2023 Final Rule)**
 - Skilled Nursing Facility (SNF) Healthcare Associated Infections (HAI) Requiring Hospitalization
 - The Skilled Nursing Facility Healthcare-Associated Infections Requiring Hospitalization measure estimates the risk-standardized rate of HAIs that are acquired during SNF care and result in hospitalization.
 - 1 year **baseline period**: FY 2022 (October 1, 2021, through September 30, 2022)
 - 1 year **performance period**: FY 2024 (October 1, 2023 through September 30, 2024)
 - **Achievement Threshold**: 0.92315, **Benchmark**: 0.95004
 - **Program year impact**: 2026
 - **Case Minimums**: SNFs must have a minimum of 25 eligible stays during the applicable 1-year performance period in order to be eligible to receive a score on the measure.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2023 Final Rule)**
 - Total Nursing Hours per Resident Day Staffing (Total Nurse Staffing) measure
 - The Total Nurse Staffing measure is a structural measure that uses auditable electronic data reported to CMS's Payroll Based Journal (PBJ) system to calculate total nursing hours per resident day. The denominator for the measure is a count of daily resident census derived from Minimum Data Set, Version 3.0 (MDS 3.0) resident assessments. The measure is case-mix adjusted based on the distribution of MDS assessments by Resource Utilization Groups, version IV (RUG-IV groups).
 - 1 year **baseline period**: FY 2022 (October 1, 2021 through September 30, 2022)
 - 1 year **performance period**: FY 2024 (October 1, 2023 through September 30, 2024)
 - **Achievement Threshold**: 3.18523, **Benchmark**: 5.70680
 - **Program year impact**: 2026
 - **Case Minimums**: SNFs must have a minimum of 25 residents, on average, across all available quarters during the applicable 1-year performance period in order to be eligible to receive a score on the measure.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2023 Final Rule)**
 - Discharge to Community (DTC)
 - This measure reports a SNF's risk-standardized rate of Medicare FFS residents who are discharged to the community following a SNF stay, do not have an unplanned readmission to an acute care hospital or LTCH in the 31 days following discharge to community, and remain alive during the 31 days following discharge to community. Community, for this measure, is defined as home or selfcare, with or without home health services.
 - **2 year baseline period:** FY 2021 through FY 2022 (October 1, 2020, through September 30, 2022)
 - **2 year performance period:** FY 2024 through FY 2025 (October 1, 2023, through September 30, 2025)
 - **Achievement Threshold:** 0.42946, **Benchmark:** 0.66370
 - **Program year impact:** 2027
 - **Case Minimums:** SNFs must have a minimum of 25 eligible stays during the applicable 2-year performance period in order to be eligible to receive a score on the measure

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2024 Final Rule)**
 - Nursing Staff Turnover Measure
 - This is a structural measure that has been collected and publicly reported on Care Compare and assesses the stability of the staffing within an SNF using nursing staff turnover.
 - 1 year **baseline period**: FY 2022 (October 1, 2021 through September 30, 2022)
 - 1 year performance period: FY 2024 (October 1, 2023 through September 30, 2024)
 - **Achievement Threshold**: 0.35912, **Benchmark**: 0.72343
 - **Program year impact**: FY 2026
 - **Case Minimum**: minimum of 1 eligible stay during the 1-year performance period and at least 5 eligible nursing staff (RNs, LPNs, and nurse aides) during the 3 quarters of PBJ data included in the measure denominator in order to be eligible to receive a score on the measure for the applicable fiscal program year.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2024 Final Rule)**
 - Long Stay Hospitalization Measure per 1000 long-stay resident days
 - This measure assesses the hospitalization rate of long-stay residents (Part A and Part B only)
 - 1 year **baseline period**: FY 2023 (October 1, 2022 through September 30, 2023)
 - 1 year performance period: FY 2025 (October 1, 2024 through September 30, 2025)
 - **Program Year Impact**: FY 2027
 - **Case Minimum**: minimum of 20 eligible stays during the 1-year performance period in order to be eligible to receive a score on the measure for the applicable fiscal program year.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2024 Final Rule)**

- Discharge Function Score measure

- This measure assesses functional status by assessing the percentage of SNF residents who meet or exceed an expected discharge function score and use mobility and self-care items already collected on the MDS.
- 1 year **baseline period**: FY 2023 (October 1, 2022 through September 30, 2023)
- 1 year performance period: FY 2025 (October 1, 2024 through September 30, 2025)
- **Program Year Impact**: FY 2027
- **Case Minimum**: minimum of 20 eligible stays during the 1-year performance period in order to be eligible to receive a score on the measure for the applicable fiscal program year.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2024 Final Rule)**
 - Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)
 - This measure assesses the falls with major injury rates of long-stay residents (All payers)
 - 1 year **baseline period**: FY 2023 (October 1, 2022 through September 30, 2023)
 - 1 year performance period: FY 2025 (October 1, 2024 through September 30, 2025)
 - **Program Year Impact**: FY 2027
 - **Case Minimum**: minimum of 20 residents in the measure denominator during the 1-year performance period in order to be eligible to receive a score on the measure for the applicable fiscal program year.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Measures (FY 2024 Final Rule)**
 - Skilled Nursing Facility Within Stay Potentially Preventable Readmissions (SNF WS PPR) (replacement of the SNFRM)
 - This potentially preventable readmission (PPR) measure estimates the risk-standardized rate of unplanned, potentially preventable readmissions that occur during skilled nursing facility (SNF) stays among Medicare fee-for-service (FFS) beneficiaries.
 - 2 year **baseline period**: FY 2022 and FY 2023 (October 1, 2021, through September 30, 2023)
 - 2 year performance period: FY 2025 and 2026 (Oct. 1, 2024 – Sept. 30, 2026)
 - **Program Year Impact**: FY 2028
 - **Case Minimum**: minimum of 25 eligible stays during the 2-year performance period in order to be eligible to receive a score on the measure for the applicable fiscal program year.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Expanded Measure Performance Scoring**

- CMS is adopting the scoring and normalizing methodologies finalized in the FY 2023 Final Rule.
- In order to be eligible to receive a score on the measure for the applicable fiscal program year, Case minimums must be met.
- In the FY 2023 Final Rule, CMS finalized updating the achievement and improvement scoring methodology, applicable to all expanded VBP measures, to allow a SNF to earn a maximum of 10 points on each measure for achievement, and a maximum of 9 points on each measure for improvement.
- For purposes of determining these points, CMS also finalized the following definitions:
- **Benchmark:** The mean of the top decile of SNF performance on the measure during the baseline period; and
- **Achievement threshold:** The 25th percentile of national SNF performance on the measure during the baseline period.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Expanded Measure Performance Scoring**
 - CMS also finalized awarding **achievement points** to SNFs based on their performance period measure rate for each measure according to the following:
 - If a SNF's performance period measure rate is equal to or greater than the benchmark, the SNF would be awarded 10 points for achievement.
 - If a SNF's performance period measure rate is less than the achievement threshold, the SNF would receive 0 points for achievement.
 - If a SNF's performance period measure rate is equal to or greater than the achievement threshold, but less than the benchmark, we will award between 0 and 10 points.
 - CMS also finalized awarding **improvement points** to SNFs based on their performance period measure rate according to the following:
 - If a SNF's performance period measure rate is equal to or lower than its baseline period measure rate, the SNF would be awarded 0 points for improvement.
 - If a SNF's performance period measure rate was equal to or higher than the benchmark, the SNF would be awarded 9 points for improvement.
 - If a SNF's performance period measure rate was greater than its baseline period measure rate but less than the benchmark, we will award between 0 and 9 points

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- Value Based Purchasing Expanded Measure Performance Scoring

Achievement	
Baseline Period	
	Benchmark (the mean of the top decile of SNF performance on the measure during the baseline period)
	Achievement Threshold (the 25th percentile of national SNF performance on the measure during the baseline period)
Performance Period	
X = 0 points	X = 10 Points
	X = between 0 and 10 points

Improvement	
Baseline Period	
	Benchmark (the mean of the top decile of SNF performance on the measure during the baseline period)
	Baseline Period Measure rate
Performance Period	
X = 0 points	X = 9 Points
	X = between 0 and 9 points

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Expanded Measure Performance Scoring**
 - CMS will score SNFs' performance on achievement and improvement for each measure and award them the higher of the two scores for each measure to be included in the SNF performance score, except in the instance that the SNF does not meet the case minimum threshold for the measure during the applicable baseline period, in which case the SNF would only be scored on achievement.
 - CMS will then sum each SNFs' measure points and normalize them to arrive at a SNF performance score that ranges between 0 and 100 points.
 - This policy is intended to appropriately recognizes the best performers on each measure and reserves the maximum points for their performance levels while also recognizing that improvement over time is important and should also be rewarded.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing Expanded Measure Performance Scoring**
 - CMS finalized the adoption of a “normalization” policy for SNF performance scores under the expanded SNF VBP Program, effective with the FY 2026 program year.
 - This policy allows for the expansion of the VBP with additional measures while maintaining a score range from 0 – 100 without further changes to the scoring methodology.
 - Under this policy, CMS will calculate a raw point total for each SNF by adding up the SNF’s score on each of the measures.
 - For example, a SNF that met the case minimum to receive a score on three quality measures would receive a score between 0 to 30 points, while a SNF that met the case minimum to receive a score on two quality measures would receive a score between 0 to 20 points. (The maximum raw point total for the FY 2026 program year would be 40 points and 80 points for FY 2027)
 - CMS would then normalize the raw point totals by converting them to a 100-point scale, with the normalized values being awarded as the SNF performance score.
 - For example, CMS would normalize a SNF’s raw point total of 27 points out of 30 by converting that total to a 100-point scale, with the result that the SNF would receive a SNF performance score of 90. Example: $(27/30) \times 100 = 90$

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

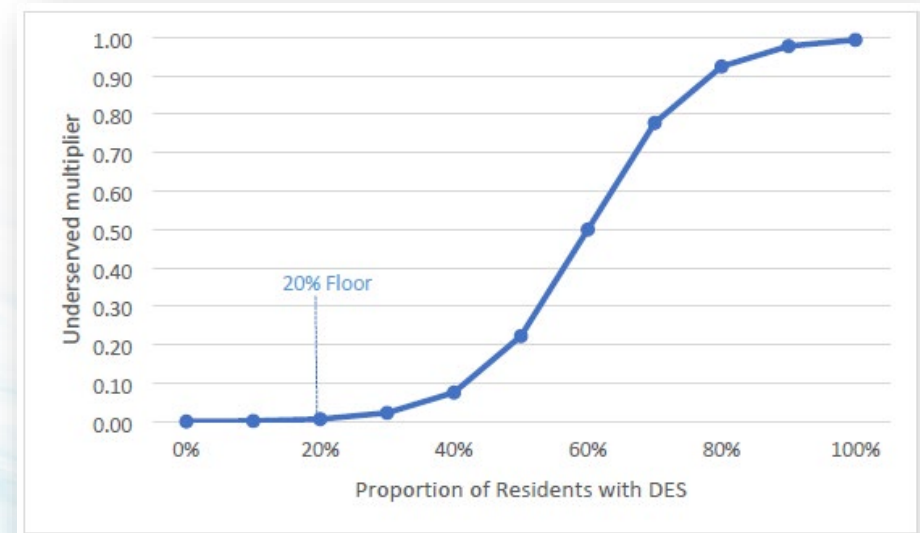
- **Value Based Purchasing FY 2024 Final Rule health Equity Adjustment**

- To prioritize the achievement of **health equity** and the reduction of disparities in health outcomes in SNFs, CMS adopting a Health Equity Adjustment in the SNF VBP Program that rewards SNFs that perform well and whose resident population during the applicable performance period includes at least 20% of residents with dual eligibility status.
- This adjustment will begin with the FY 2027 program year based on FY 2025 performance year.
- CMS will adjust the scoring methodology to provide bonus points to high-performing facilities (CMS defines a top tier performing SNF, as a SNF whose score on the measure for the program year falls in the top third of performance, or greater than or equal to the 66.67th percentile) that provide care to a higher proportion of dual eligible residents.

Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing FY 2024 Final Rule health Equity Adjustment (cont.)**

- In addition, CMS will increase the payback percentage policy under the SNF VBP program from current 60% to a level such that the bonuses provided to the high performing, high duals SNFs do not come at the expense of the other SNFs. The estimates for FY 2027 program year is 66%.
- **Bonus Scoring Methodology (if 20% DES):**
 - **Measure Performance Scaler:** 2 bonus points for each VBP measure scoring in the top 66.67th percentile.
 - **Underserved Multiplier:** the number representing the SNF's proportion of residents with DES out of its total resident population in the applicable program year, translated using a logistic exchange function
 - **HEA bonus points** = measure performance scaler × underserved multiplier



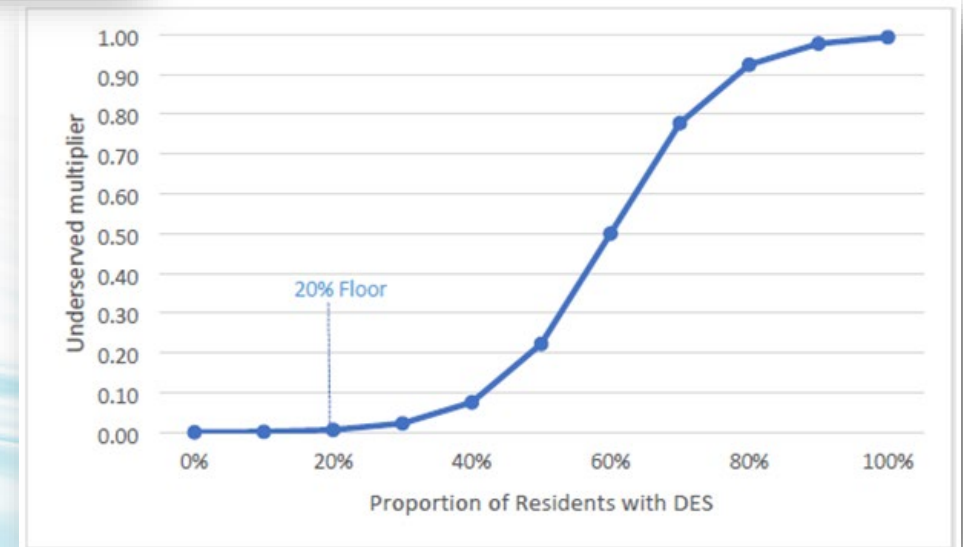
Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

TABLE 20: Example of the HEA Bonus Points Calculation

Example SNF	Measure Performance Scaler [A]	Proportion of Residents with DES (%) [B]	Underserved Multiplier [C]	HEA bonus points [D] ([A]*[C])
SNF 1	16	50	0.22	3.52
SNF 2	14	70	0.78	10.92
SNF 3	10	10	0	0
SNF 4	2	80	0.92	1.84

TABLE 21: Example of the HEA Bonus Points Calculation

Example SNF	Normalized Sum of all Points Awarded for each Measure [A]	HEA Bonus Points (Step 3, Column [D]) [B]	SNF Performance Score ([A] + [B])
SNF 1	80	3.52	83.52
SNF 2	65	10.92	75.92
SNF 3	42	0	42.00
SNF 4	10	1.84	11.84



Skilled Nursing Facility Value-Based Purchasing (SNF VBP) Program

- **Value Based Purchasing FY 2024 SNF PPS final Rule**
 - CMS is also proposing to update administrative methodology policies that are required to address the changes needed to accommodate the addition of quality measures into the SNF VBP Program's scoring methodology, i.e., measure minimums.
 - **FY 2026 program year:** SNFs must report the minimum number of cases for two of the four measures during the performance period to be included in the FY 2026 program year.
 - **FY 2027 program year:** SNFs must report the minimum number of cases for four of the eight measures during the performance period to receive a SNF Performance Score and value-based incentive payment

A decorative graphic of light blue water ripples is positioned at the bottom of the slide, extending from the left edge towards the center. The ripples are concentric and create a sense of movement and depth.

QUESTIONS?