Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program

Inpatient and Outpatient Healthcare Quality Systems Development and Program Support

IPFQR Program:
Inpatient Psychiatric Facility
Patient Assessment Instrument (IPF-PAI)
Overview, Development, and Participation
Question and Answer Summary Document

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December 17, 2024
2:00 p.m. Eastern Time

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General Responses to Questions Regarding Implementation

- CMS will announce updates to the IPF-PAI and opportunities for interested parties to contribute through via the Inpatient Psychiatric Facility Quality Reporting Program Listserv.
- CMS seeks to partner with IPFs and interested parties in the development of the IPF-PAI regarding the standardized data elements to include and the data collection and submission processes. IPF provider and staff input will be incorporated into the development and testing process.
- CMS will propose the IPF-PAI in rulemaking in the IPF Prospective Payment System (PPS) after development, testing, and analyses are completed.
- CMS will make final decisions through notice-and-comment rulemaking about the form, manner, and timing of the IPF-PAI data collection and submission after development and testing.
- At this time, CMS has not yet determined the type and number of assessment items that will comprise the first version of the IPF-PAI or the estimated amount of time it will take to complete the IPF-PAI. However, CMS intends to give IPFs and software vendors sufficient time to develop or modify systems to support the collection and submission of the IPF-PAI. CMS intends to make final technical specifications for data collection and submission of the IPF-PAI available approximately 12 months prior to implementation.

Webinar participants asked the following questions, and subject-matter experts provided these responses.

IPF-PAI Alpha Test

Question 1: **How will CMS ensure that Alpha testing will include a representative mix of facilities, including those with no electronic medical record (EMR) access?**

We welcome input from a variety of IPFs, and we will announce opportunities to participate in IPF-PAI development and testing through various channels. This will give many IPFs an opportunity to volunteer to participate. CMS is also aware of and taking into consideration those with and without electronic health records. For IPFs that are interested in learning about opportunities to be involved in the development of the IPF-PAI, please reach out to IPF-PAI_testing@abtglobal.com.

Question 2: **Would IPF staff participating in the Alpha test have access to the IPF patient assessment instrument under development?**

IPF staff who volunteer to participate in the Alpha test reviewed and provided feedback on a selection of candidate data elements, not the full IPF-PAI. This allowed for more focused feedback regarding potential data elements and items.

Question 3: **Does testing include an opportunity for input outside of administering the tool and its effectiveness, specifically the technical components around implementation, abstraction, quality review, and submission of the IPF-PAI?**

Testing includes opportunities to provide input on questions such as implementation, abstraction, quality review, and submission of the IPF-PAI.

IPF-PAI Development Process

Question 4: **How were the candidate data elements determined?**

Per Section 4125 of the Consolidated Appropriations Act, 2023, the IPF-PAI must collect patient data for six categories: functional status; cognitive function and mental status; special services, treatments, and interventions; medical conditions and comorbidities; impairments; and other categories deemed appropriate. CMS gathered data elements and items from existing CMS instruments, such as the Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI) and other publicly available item sets and tools, and incorporated responses to the request for information presented in the fiscal year (FY) 2025 IPF PPS proposed rule. CMS aims to include candidate data elements that best align with the IPF setting and CMS's goal to improve care, while also minimizing administrative burden. CMS welcomes IPF input via the Alpha test, Beta test, and rulemaking.

Question 5: **How will the cost and burden of IPF-PAI data collection be determined?**

To the extent possible, CMS seeks to minimize patient and provider burden with the implementation of the IPF-PAI. The Beta field testing of the IPF patient assessment, anticipated for Summer/Fall 2025, will provide CMS with some of the necessary information regarding duration, length, feasibility, validity, and cost of implementing the IPF-PAI. Information regarding cost and burden will then be provided when the IPF-PAI is proposed in rulemaking.

Implementation

Question 6: **Is this a tool to incorporate within our current assessments or something we will abstract?**

CMS intends for the IPF-PAI, when finalized in rulemaking, to align with current assessments and processes. We are seeking feedback from IPFs during the IPF-PAI testing phases on their existing processes and assessments to better understand how the IPF-PAI may be integrated into systems. CMS intends to give IPFs and software vendors at least 12 months before implementation to develop or modify systems to support the collection and submission of the IPF-PAI and each IPF will be able to make their own determination on how best to implement the IPF-PAI within their clinical practices and patient assessment processes.

Question 7: **How is this different from the information collected by our nurses, physicians, and social workers?**

At this time, the IPF-PAI is in development and CMS is seeking feedback from IPFs to better understand how the IPF-PAI may be aligned with current data collection processes and integrated into existing systems. To the extent possible, CMS seeks to minimize provider burden with the implementation of the IPF-PAI and additional information will be available when the IPF-PAI is proposed in rulemaking.

Question 8: **When will collection and submission of IPF patient assessment data be mandatory?**

Per the Consolidated Appropriations Act of 2023, IPFs will submit data using the IPF-PAI beginning FY 2028 for both admissions and discharges.

Question 9: **Will the IPF-PAI be required for all inpatients or just those that are Medicare or Managed Medicare payers?**

A decision has not been made regarding which patients will require an IPF-PAI to be submitted. This information will be available when the IPF-PAI is proposed in rulemaking.

Question 10: **Will IPFs submit IPF-PAI data annually or more frequently, and how will IPF-PAI data be submitted?**

At this time, the IPF-PAI is in development and decisions have not yet been made about data collection frequency and submission requirements and processes. This information will be available when the IPF-PAI is proposed in rulemaking.

Providing Input

Question 11: **Is there a copy of the assessment tool?**

The candidate data elements and draft IPF-PAI are not publicly available at this time as the instrument is still under development.

Question 12: **Is there a location to review the IPF-PAI for public comment?**

Currently, the IPF-PAI is not available for public comment as it is still under development. However, through Alpha and Beta testing, IPFs that participate in testing will be able to review draft versions of the IPF-PAI and candidate data elements to provide feedback, as CMS aims to partner with IPFs and interested parties to determine the appropriate elements to include. The final instrument will be available for IPF review and comment during rulemaking.

Parties interested in learning more can visit https://qualitynet.cms.gov/ipf/PAI, subscribe to IPFQR Notify: Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program Notifications Listserv for updates about the IPF-PAI, or e-mail IPF-PAI_testing@abtglobal.com.