



Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program
Inpatient and Outpatient Healthcare Quality Systems Development
and Program Support

IPFQR Program FY 2025 APU Reconsideration Process
Presentation Transcript

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September 17, 2024
2 p.m. Eastern Time

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Jamie Halloran: Hello. Welcome to the *IPFQR Program Fiscal Year 2025 APU Reconsideration Process* webinar. My name is Jamie, and I will be your moderator for today's event. At this time, all participants are in a listen-only mode. Later, we will conduct a question-and-answer session, at which time I will provide further instructions on how to ask questions. Please note that the conference is being recorded. Now, I will turn the call over to our first speaker, Lisa Vinson. Lisa, the floor is yours.

Lisa Vinson: Thank you, Jamie. Hello, everyone. Again, welcome to today's webinar. My name is Lisa Vinson, and I am the Program Lead for the Inpatient Psychiatric Facility Quality Reporting, or IPFQR, Program with Inpatient and Outpatient Healthcare Quality Systems Development and Program Support. I will be the presenter for today's event. Also joining us today and represented on the call are members of our support team. Of note, the recording slides and transcript of the presentation will be posted on both [QualityNet](#) and [Quality Reporting Center](#) websites during the reconsideration period. As Jamie mentioned, at the conclusion of this webinar, we will open the floor for questions, and she will be providing instructions at that time regarding how to ask your questions. Please be advised that we will only be able to answer questions about the reconsideration process. We will not be able to address specific questions related to your facility situation. We will provide information later in the presentation on where to direct these inquiries. There is also related information provided in the APU notification letter your facility received. Next slide, please.

Here is a list of the acronyms that will be referenced today during our presentation. Next slide, please.

The purpose of today's presentation is to provide information regarding the CMS Inpatient Psychiatric Facility Quality Reporting Program annual payment update reconsideration process for fiscal year 2025. CMS is currently making annual payment update decisions that will affect an IPF's Medicare reimbursement between October 1, 2024, and September 30, 2025, which is fiscal year 2025. Next slide, please.

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At the end of this 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. Next slide, please.

This slide lists all the requirements to participate in the IPFQR Program and qualify to receive the full fiscal year 2025 APU. Specifically, eligible IPFs had to meet the following requirements by the August 15, 2024, deadline: IPFs have an IPFQR Program Notice of Participation, or NOP, status of Participating; IPFs must have submitted patient-level and facility-level measure data; lastly, IPFs must have completed the Data Accuracy and Completeness Acknowledgement, also known as the DACA. Eligible IPFs that did not meet all the reporting requirements as described on this slide will be subject to a 2-percentage point reduction of their annual payment update. Next slide, please.

This slide lists the four major requirements to participate in the IPFQR Program and qualify to receive the full fiscal year 2025 APU. Specifically, eligible IPFs had to submit all four quarters of 2023 COVID healthcare personnel measure data to the National Healthcare Safety Network by the dates indicated in the table on this slide and had to meet the following requirements by the August 15 deadline: IPFs have an IPFQR Program Notice of Participation status of Participating, submit measure and nonmeasure data, and complete the DACA. Eligible IPFs that chose not to participate in the IPFQR Program for fiscal year 2025 or did not meet all of the reported requirements, again, will be subject to a 2-percentage point reduction of their APU during the fiscal year 2025, which begins October 1, 2024, and ends September 30, 2025. Next slide, please.

APU Determination Notification Letters were mailed on Tuesday, September 10, 2024, 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. Next slide, please.

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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 this page by going to the link that is provided on this slide. Next slide, please.

This slide details how to access APU reconsideration information from the QualityNet website as referenced on the previous slide. From the QualityNet home page, you can click on the Inpatient Psychiatric Facilities button. In the Inpatient Psychiatric Facilities Quality Reporting Program box, click the Learn More button. Next, you will click on APU in the top menu. On the page that appears, 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 2025. Next slide, please.

Specific to 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 that it did meet the IPFQR Program requirement or requirements and should receive a 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 and attachments, if applicable, may be submitted by any of the three methods listed on this slide. They include the *Hospital Quality Reporting Secure Portal* Managed File Transfer to QRFormSubmission@HSAG.com. The form may also be submitted via secure fax to 877-789-4443 or by email to QRFormSubmission@HSAG.com. Upon receipt of the reconsideration request, an email acknowledgement will be sent notifying the facility, CEO, and Security Official that the form has been received. CMS expects the process to take no longer than approximately 90 days from receipt of the Reconsideration Request Form. Next slide, please.

If a facility is dissatisfied with the result of CMS's reconsideration determination, the facility may file a Provider Reimbursement Review Board, or PRRB, appeal.

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An appeal can only be filed with the PRRB 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. Next slide, please.

Please submit all questions regarding the APU reconsideration process to the IPFQR Program at InpatientSupport@HSAG.com. You can submit questions about a reconsideration request that you submitted to CMS at Reconsideration@cms.hhs.org. You may submit any additional questions about the IPFQR Program to the Inpatient and Outpatient Healthcare Quality Systems Development and Program Support team at the link listed in the third bulleted point on this slide. Next slide, please.

Now we have some time to address your questions. Please remember that we will only be able to answer questions about the reconsideration process. We will not be able to answer any questions specific to your facility situation. Our moderator, Jamie, will now provide information about how to submit your question.

Jamie Halloran

Thank you, Lisa. If you have a question, please press the raised-hand feature as indicated by the image on this slide, and note that the icon may appear on either side of your screen. If you wish to be removed from the queue, please press the hand icon again to lower your hand. At this time, we'll wait for our first question to come in. OK. We have our first question from Melissa Hoyt. Melissa, go ahead with your question.

Melissa Hoyt:

I was just wondering if we still needed to submit the data that we missed in order to be considered for the reconsideration.

Donna Bullock:

Hi, this is Donna. You do not have to submit the data in order to request a reconsideration. In fact, it is too late to submit the data.

Melissa Hoyt:

Okay, thank you.

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Jamie Halloran: It looks like our next question is coming from Meenu Arora. Go ahead with your question.

Meenu Arora: Can you hear me?

Jamie Halloran: Yes, we can hear you.

Meenu Arora: My question was regarding the APU notice. Does it apply only to the inpatient psych program or is the 2-percent reduction applying to the inpatient program as well, or is it only specific to the psych program?

Lisa Vinson: Hi, this is Lisa. Yes, the notification that you received is only specific to the IPFQR Program as it relates to fiscal year 2025 program requirements.

Meenu Arora: OK. Just to follow up to this, if the psych facility has been closed, and it's just awaiting some paperwork to be submitted. We already did the Notice of Participation on QualityNet that we are not participating. I think there is some paperwork that still needs to be submitted. Do we still need to file the reconsideration form?

Mary Ann Jones: Hi, this is Mary Ann Jones. I can answer that question. That's entirely up to you and your facility. Until we or CMS receives the official deactivation of your CCN number and closure of your facility, we will still consider that facility open. So, we would still have to process everything we normally do. So, with that being said, the facility would still be subject to the penalty, but, if there are no cases being billed at that time or will not be billed ever again, it really is a moot point, but you have to make that decision if the risk is to not submit that reconsideration or to submit it. You could submit your reconsideration and state that your facility is closing, and, as soon as you have that paperwork, if you send it to us, then we'd be more than happy to assist with getting it closed officially in our systems.

Meenu Arora: Sounds good. Thank you so much. This is helpful.

Mary Ann Jones: You're welcome.

Jamie Halloran: Thank you. Our next question comes from Rosa Morales. Rosa, go ahead with your question. Rosa, can you hear us? OK.

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While we're waiting for Rosa, we'll move on to our next question. I apologize if I say the name wrong. Ania Gonzalez, go ahead with your question.

Ania Gonzalez: Hi, yes. This is Ania from Larkin Community Hospital. So, my question was, in order to submit the APU request, because I continue to hear about QualityNet, do we need to have access to QualityNet, or is this a form that we will be filling out and sending to a specific email or person?

Donna Bullock: Hi, this is Donna Bullock. On slide 10 of the webinar, it spelled out three ways that you can submit your reconsideration request. You can submit it via the *QualityNet Secure Portal*, the Managed File Transfer, but you don't have to do that. You can email it to us using that email address right there. That's on slide 10, and there is a secure fax number on slide 10 also. Once we get it, we will send a confirmation that we received it. If you do not receive a confirmation of receipt within one business day, it means we did not get it. So, give us a call, and we'll try to figure out what's going on for you.

Ania Gonzalez: Perfect. Thank you.

Jamie Halloran: Thank you. For our next question, let's see if we can get Rosa back on. Rosa Morales, go ahead with your question. You may need to unmute on your end as well. OK. We'll move to the next question from Diane Tramtolo. Diane, go ahead with your question. You may also need to unmute yourself. OK. We'll move on to the next question from William Graham. William, go ahead with your question.

William Graham: Yes, ma'am. We submitted our data onto the website here in a timely fashion here. Could it be a possibility that you guys may have not received it? If so, if we do the reconsideration form here, can we also send supporting documentation that it was submitted by that time?

Mary Ann Jones: Hi, this is Mary Ann Jones. I can answer that, hopefully. There's always the chance that something goes astray when you're sending over the internet or when you're working in the system, so there could be a reason why it didn't make it to where it was supposed to be.

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What my recommendation would be is, in your reconsideration, supply any documentation you have that shows that you did submit the data and when you submitted the data. Do you have screenshots, whatever you can, to support the fact that you did submit the data? Then, CMS will review that, and it'll help them make a determination.

William Graham: OK. Thank you, ma'am, I appreciate it.

Mary Ann Jones: Sure.

Jamie Halloran: Thank you. Our next question comes again from Rosa Morales. Rosa, go ahead. Hopefully, we can hear you.

Melissa: Hi, this is Melissa. I'm on her link. I have a question. Can we get a printout, or can we get to this webinar, so that we can copy it and make sure that everyone has the same knowledge that we do?

Jamie Halloran: This is Jamie. So, it's actually going to be posted to the Quality Reporting [Center] website after this event. Also, if you look your screen, there is a handout section where you can download the slides currently. The recording and everything will be up after the event is over today. OK. Our next question comes from Laura Crabb. Laura, go ahead with your question.

Laura Crabb: Yes, we received our new CCN number in 2023 that was effective for January 1. Is there a grace period for reporting in NHSN?

Lisa Vinson: Hi, this is Lisa. If you would be so kind to actually submit an email regarding that just so that I can research that further for you. If you could send it to IPFQualityReporting@HSAG.com, I can look into that for you and provide you some additional information.

Laura Crabb: OK. Thank you.

Lisa Vinson: You're welcome.

Jamie Halloran: At this time, I'm not showing any more questions. We'll just wait a few moments. Again, use the raised-hand feature. OK.

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It looks like we now have a question from Jessica Simpkins. Jessica, go ahead with your question.

Jessica Simpkins: Hi, so it's actually not a question. I wanted to also throw this out there. As the gentleman just said, you know, we submitted our information timely before the deadline, but, for some reason, it didn't transfer over to you. So, I did just want to throw that out there that I think that that's actually happened at a couple facilities now. The information was entered, but, for some reason, it's not getting through the platform to you. So, I just wanted to throw that out there.

Mary Ann Jones: This is Mary Ann. Are you talking about the data you're entering through the CDC, or are you talking about other data, just their data?

Jessica Simpkins: I'm talking about, for example, like the COVID data that was due recently through NHSN. All of that was entered for all of 2023 for my facility, but yet, for some reason, you guys couldn't see it on your end.

Mary Ann Jones: You may want to also reach out to the CDC and through the NHSN Help Desk, and ask them if they could verify why you were showing as non-submitting. For any of the NHSN, COVID, or that type data, we get a file from them that says who did and who did not submit. So, that's where our data comes from. So, you may want to check with them because it could have something to do with your mapping of your facility or your units, or it could have something to do with the way that your data was entered. It might give you a little more information to support your appeal.

Jessica Simpkins: Absolutely. I appreciate that. Thank you.

Mary Ann Jones: Thank you.

Jamie Halloran: Our next question comes from Diane Tramtolo. Diane, go ahead with your question, and you may need to unmute yourself.

Diane Tramtolo: Hello. I apologize. It wasn't allowing me to unmute. Two things: I would like to also add on that we have now received two letters for information that we have submitted to NHSN in a timely manner.

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We have received letters on that information. My second question is: Is there any consideration made for messy acquisitions, or is that something where we just need to figure out? You know, a process that maybe wasn't passed on well.

Mary Ann Jones: Can you repeat that? On what kind of transition?

Diane Tramtolo: It's just a new acquisition for a hospital, if there's no great handoff between, you know, corporate from the previous hospital to the new hospital on when things are due and things like that. We now have our arms around it, but, for this last letter that we've received, I'm just wondering if there's any consideration taken for a messy acquisition.

Mary Ann Jones: We can't speak for CMS and how CMS is going to evaluate each individual reconsideration. They look at each one independently, and they evaluate all of the information that is submitted. So, I would just recommend really detailing your reasons on why you feel that the appeal should be overturned.

Diane Tramtolo: OK. Thank you.

Jamie Halloran: Thank you. Our next question comes from Misty Szmanski. Go ahead with your question.

Misty Szmanski: I just want to piggyback on what everybody else is saying. It seems like there's an NHSN error with the reporting of the COVID data since there's so many of us, and we have confirmation that it was submitted and went through. So, I just want to clarify that you're recommending that we all contact NHSN to figure out where the disconnect was between us submitting the data to them and it making to CMS.

Mary Ann Jones: That is my recommendation. We do not routinely see significant errors through the population of both the inpatient and the inpatient psychiatric facilities with the transmission of data to CDC, but that doesn't mean that cannot happen. Again, we can't at this point in the presentation today really determine why a facility did or didn't fail.

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My recommendation to reach out to the CDC was mainly for your support so that you would have some supporting documentation because there usually is a specific reason, and they can provide you with that reason.

Misty Szmanski: Thank you.

Jamie Halloran: Thank you. Our next question comes from Nettie Liner. Go ahead with your question.

Nettie Liner: Thank you. Mine is the similar one that we've been hearing about NHSN. We had been aware of this as an issue back in November for our Quarter 2 data and thought it was resolved and realized it wasn't when it came around time for the DACA. Since we had gotten confirmation from NHSN that our data was there, I was wondering if anyone on the call knows. Do they resubmit, or is that something that we should have requested? Will you try resubmitting?

Mary Ann Jones: This is Mary Ann. We don't have that information from the CDC, again, because this presentation is really focused on the reconsideration process and not how to resolve those issues. That would be best answered by the CDC because we are two completely separate entities, so we don't have their information.

Jamie Halloran: OK. At this time, I don't show any further hands raised. We'll wait another moment here to see if anyone else has any additional questions.

Mary Ann Jones: Jamie, while you're waiting on that, can I just say, you know, our recommendation is, since this presentation is focused on the reconsideration process and how to go through with submitting something to CMS, to support your reason why you feel that your reconsideration should be overturned. Please do submit any detailed information you have that can be in written form. It could be in copies of documentation you have, either emails back and forth with the CDC or with the QualityNet system or screenshots that you have. We always recommend taking screenshots each time you submit your data, but any supporting documentation you have will provide much more information for CMS to make a good decision.

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- Jamie Halloran:** Thank you, Mary Ann. It looks like we now have a question from Jessica Woodsmall. Jessica, go ahead with your question.
- Jessica Woodsmall:** If we have a potential issue with our CCN number, who do we reach out to for that? I have a facility. I actually have two facilities under the same CCN number with a duplicate MRN issue, but I'm not sure who to contact regarding that CCN issuance problem.
- Mary Ann Jones:** The duplicate CCN, are you saying that each facility was assigned the same CCN.
- Jessica Woodsmall:** Correct. They were supposed to have been; however, they now have duplicate medical record numbers. We're trying to work through that process. In the meantime, I don't know who to contact at CMS about the reporting period in general.
- Mary Ann Jones:** I apologize, but I'm not quite sure what the question is, what issue you are trying to get resolved. If you want to send us an email and just give us a little more information, we'd be more than happy to try and research it and help you with that.
- Jessica Woodsmall:** OK. Who do I email?
- Mary Ann Jones:** Lisa, what is that email? She knows it better than I do.
- Lisa Vinson:** Sure. It is IPFQualityReporting@HSAG.com.
- Jessica Woodsmall:** Thank you.
- Lisa Vinson:** You're welcome.
- Jamie Halloran:** Thank you. At this time, we are showing no further questions, and we can just wait one more moment. OK. With no further questions, I'll hand it back to you, Lisa, to end the presentation.
- Lisa Vinson:** Thank you, Jamie. This concludes our question-and-answer session. We hope that this information was beneficial. Thank you for joining us, and enjoy the remainder of your day.