

SNF Quality Reporting Reconsideration and Exception & Extension(Archived)

The Reconsideration Requests webpage provides information and updates related to the reconsideration process for the SNF QRP. On this page, you will find guidelines and processes for submitting reconsideration requests.

Updates

May 12, 2017

Due to extenuating circumstances, the reporting deadline for the FY 2018 SNF QRP payment determination has been extended from May 15, 2017 to June 1, 2017.

November 16, 2016

Extraordinary Circumstances Extension / Exception (ECE) due to Hurricane Matthew

The Centers for Medicare & Medicaid Services (CMS) is issuing a blanket exemption for data submission for the Skilled Nursing Facility (SNF) Quality Reporting Program (QRP), for Medicare providers adversely affected by the devastating impact of Hurricane Matthew.

SNF providers located within the Federal Emergency Management Agency (FEMA)-designated "major disaster" counties in Georgia, Florida, North Carolina, and South Carolina will not be required to submit quality measure data to meet submission requirements for the reporting quarters specified by CMS. For a list of the designated counties and other information, see the related Extraordinary Circumstances Extension / Exception (ECE) due to Hurricane Matthew document below.

Exemptions are being issued for several quality reporting data submission requirements because of possible damage to facilities and/or systems resulting in their inability to gather or submit data, as well as the need to prioritize immediate resources for direct patient care.

SNF QRP Exemptions

CMS has granted a blanket exemption for all SNFs **in the designated counties** for the following SNF QRP data submission requirements, including required quality data submitted via the Minimum Data Set (MDS):

- Fourth Quarter 2016 (October 1, 2016 – December 31, 2016) for May 15, 2017, submission deadline for FY 2018 APU Determination

Please note that this exemption applies to quality data only, that is data used for the SNF Quality Reporting Program and to determine APU compliance and has no effect on the submission of the MDS for payment or other required purposes. While you can continue to submit quality data to CMS, any data submissions for the above-listed exempt CY 2016 quarters(s) will not be considered when determining compliance related to the FY 2018 reporting requirements for your SNF. That is, you will not be held accountable for data collected and submitted during the above identified 2016 quarters. We would like to also note that this exemption from quality reporting requirements for the SNF QRP may impact the minimum case threshold counts for calculation of quality metrics, in which case CMS would suppress the applicable data on the SNF Compare site, when quality measure target periods that include Q4 2016 data are calculated and posted. SNF providers may submit questions about this blanket exemption to SNFORPReconsiderations@cms.hhs.gov.

For SNFs outside the FEMA-designated counties that were affected by Hurricane Matthew, please follow the directions related to requesting an exemption or extension as listed on this webpage.

SNF QRP Reconsideration and Appeals Procedures for the FY 2018 Payment Determination

In the Skilled Nursing Facility Prospective Payment System Final Rule 42 FR Part 483, the Centers for Medicare & Medicaid Services (CMS) finalized the FY 2016 Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) requirements. Any SNF determined to be non-compliant with the SNF QRP requirements may be subject to a two (2) percentage point reduction in their annual payment update (APU). Any SNFs found non-compliant according to the quality reporting requirements will receive a letter of notification along with instructions for requesting reconsideration of this decision.

For FY 2018 payment determination, SNFs are required to collect the following quality measures:

Name of Measure	Data Collection Source	Data Collection Period	Data Submission Deadline for FY 2018 Payment Determination
NQF# 0678: percent of Patients or Residents with Pressure Ulcers that are New or Worsened	MDS	10/01/16-12/31/16	May 15, 2017*
NQF# 0674: Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)	MDS	10/01/16-12/31/16	May 15, 2017*
NQF#2631:Application of Percent of Long- Term Care Hospital Patients with and Admission and Discharge Functional Assessment and a Care Plan that Addresses Function	MDS	10/01/16-12/31/16	May 15, 2017*

What is Reconsideration?

Reconsideration is a request for a review of the compliance decision.

When Would an SNF Submit a Reconsideration Request?

SNFs may file for reconsideration if they believe the finding of non-compliance is in error, or they have evidence of the impact of extraordinary circumstances which prevented timely submission of data.

Reconsideration Request Process

To apply for reconsideration, the SNF must receive a CMS letter of non-compliance. A SNF disagreeing with the payment reduction decision may submit a request for reconsideration to CMS within thirty (30)day deadline.

Create a Reconsideration Request

Please note: The only method for submitting reconsideration requests is via email. Requests submitted by any other means will not be reviewed for reconsideration.

The SNF may request an exception or extension for one or more quarters by submitting a written request to CMS that contains the information noted below, via email to the:

SNF Exception and Extension mailbox at SNFORPreconsiderations@cms.hhs.gov.

Requests sent to CMS through any other channel will not be considered as valid requests for an exception or extension from the SNF QRP's reporting requirements for any payment determination. We note that the subject of the email must read "SNF QRP Exception or Extension Request" and the email must contain the following information:

- SNF CCN;
- SNF name;
- CEO or CEO-designated personnel contact information including name, telephone number, email address, and mailing address (the address must be a physical address, not a post office box);
- SNF's reason for requesting an exception or extension;
- Evidence of the impact of extraordinary circumstances, including but not limited to photographs, newspaper and other media articles; and
- A date when the SNF believes it will be able to again submit SNF QRP data and a justification for the proposed date. Please note: Do not include protected health information (PHI) or other Health Insurance Portability and Accountability Act (HIPAA) violations in the documentation being submitted to CMS for review.
- Proof of submission
- Email communications
- Data submission reports from the Quality Improvement Evaluation System (QIES)
- Data submission reports from the National Healthcare Safety Network (NHSN)
- Proof of approved exception or extension for the reporting time frame
- Copy of the CCN activation letter

Other documentation supporting the rationale for seeking reconsideration

Please note: Do not include PHI or other HIPAA violations in the documentation being submitted to CMS for review.