



August 28, 2018

Mary Pratt, M.S.N., R.N.
Director of the Division of Chronic and Post-Acute Care
Centers for Medicare and Medicaid
Mary.Pratt@cms.hhs.gov

Dear Ms. Pratt,

We at LeadingAge are working to help our skilled nursing facility members comply with the quality reporting required under the IMPACT Act of 2014. We understand how important it is for CMS to collect complete and accurate data on post-acute care so that quality can be compared across post-acute care settings.

Following notification of skilled nursing facilities (SNFs) of their noncompliance with the SNF Quality Reporting Program (QRP) and subsequent 2% penalty, we heard from our member nursing homes around the country who received such letters and some common issues were identified. We would like to discuss potential solutions to these issue with you in order to prevent future noncompliance to the extent possible and ensure that the SNF QRP achieves its goals. For example:

- It would be helpful if monthly or quarterly reports could be made available to SNFs on their reporting percentages so they could identify earlier that they were heading toward non-compliance and take steps to correct their reporting. Currently, these quarterly Review and Correct reports only show how a SNF performed from a quality perspective on a particular measure. Additional supporting reports that provide patient level detail may also facilitate corrections and ultimately better reporting.
- The directive not to send personal health information with a nursing home's request for reconsideration requires a time-consuming process that takes away from direct care. We would like to discuss whether there might be a more efficient way to submit the necessary documentation, possibly through encryption, as part of the reconsideration process.
- The formation of a stakeholder group could also be helpful in identifying other systematic changes in the data submission process to facilitate accurate and timely reporting.

We would be interested in learning how SNFs performed this first full year of reporting (e.g. number of SNFs receiving noncompliance notices, breakdown of reasons for noncompliance, reconsiderations requested, reconsiderations granted). These data points would help us better understand the breadth of the problems folks are having and where we should focus our future

education/training and communication to help providers meet the reporting requirements from here forward.

LeadingAge shares your goal of an accurate reporting system on nursing home quality. Our nursing home members are not failing to comply because they don't wish to. More likely it is because they believed they were complying and were surprised to find out the contrary was true. Regrettably, they must endure a 2% penalty on their rates for a full year because they didn't fully understand the information they were being given. We have produced webinars, educational sessions, newsletter and website articles and other materials to help our member nursing homes comply with the quality reporting requirements.

We would like to request an opportunity to meet with you and your team to discuss further steps that can be taken to facilitate the process and ensure timely and accurate reports.

Sincerely,

A handwritten signature in blue ink that reads "Nicole O. Fallon". The signature is written in a cursive style with a large, prominent "N" and "F".

Nicole O. Fallon
Vice President, Health Policy & Integrated Services
LeadingAge
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