Public Policy Updates
2022

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What will we cover today?

• Hospital Inpatient Prospective Payment System (IPPS) and Long Term Care Hospital Prospective Payment System 2023 Proposed Changes
• Streamlined Modular Certification Transition
• TEFCA Standard Operating Procedures
Hospital Inpatient Prospective Payment System (IPPS)

Long Term Care Hospital Prospective Payment System 2023 (LTCH PPS)
Why does it matter to us?

Proposed changes for 2023.
IPPS is proposed changes to hospital requirements for reporting as well as Conditions of Participation (i.e., what hospitals must meet to receive Medicare funding) for 2023.
We would love to hear from you!
What is covered in the Proposed Changes?

- Medicare Maternal Health
- Maternal Health Equity
- Health Equity
- Social Determinants of Health (SDOH)
- Health Related Social Needs (HSRN)
- Supplemental Payments for Indian Health, Tribal Health, and Puerto Rico
- Measuring Healthcare Quality Disparities
- And more
Key Proposed Medicare Maternal Health Policies

- Establish a publicly-reported, public-facing hospital designation on the quality and safety of maternity care.

- Cesarean Birth eCQM in the Hospital IQR Program measure set, to be available for hospitals to select for reporting beginning in the Calendar Year (CY) 2023 reporting period and the FY 2025 payment determination.

- Severe Obstetric Complications eCQM in the Hospital IQR Program measure for reporting beginning in the Calendar Year (CY) 2023 and the FY 2025 payment determination.

- Conditions of Participation

- Request for Information- Racial, ethnic, geographic
Health Equity

✓ Social Determinants of Health (SDOH)

✓ Health Related Social Needs (HRSN)
  ✓ Screening

✓ Hospital Commitment to Health Equity Measure
  ✓ Strategic planning that prioritizes equity
  ✓ Improved data collection
  ✓ Effective data analysis
  ✓ Quality improvement efforts
  ✓ Leadership engagement on fostering a culture of equity.
Supplemental Payments

Indian Health Services, Tribal Health, Puerto Rico

- Uncompensated Care
- Discontinuing dipropionate share hospital Medicare payments
- New permanent supplemental payment for hospitals
  - Based on difference between new payment amount using new DSH and old payment
Healthcare Quality Disparities and Healthcare Equity in Long Term Care Hospitals

- Want to look at how SDOH can be attributed to clinical and non-clinical factors
  - How to narrow gaps in outcomes, help LTCH address gaps in facilities
- Equity for inclusion
  - Reward Health equity summary score
  - Hospital Commitment to Health Equity
  - Providers that demonstrate good performance in care to those with social risk factors
- Request for information
  - Guiding principles for selecting and prioritizing measures for disparity reporting across CMS quality programs
  - Principles for social risk factor and demographic data selection and use
  - Identification of meaningful performance differences
  - Guiding principles for reporting disparity results.
Climate Change

☑ Impact of climate change on healthcare
☑ Climate related disasters
☑ Climate related emergencies
☑ Reducing emissions
☑ Preparation for climate impacts
☑ Emergency preparedness
☑ Tracking progress
☑ Effect on Community
What else is in the rule?

✓ Payment Rates
✓ COVID related areas
  ✓ Payment adjustments for N-95
✓ Graduate Medical Education (GME) proposals
✓ Wage Index Decreases
✓ Voluntary Cancer Reporting
✓ And more:
MiHIN Comments to IPPS Rule

Due June 17, 2023

✓ Insight into how reported data will be actionable moving forward
✓ Listing HIEs as a resource for meeting certain measures or as evidence of effort
✓ Best practices for patient matching into quality initiatives
✓ Updates to Notice of Privacy Practices to preserve patient autonomy
✓ Burden of Conditions of Participation during a time where resources may already be limited
✓ Clarity on sharing information with community based organizations for SDOH and HRSN
✓ Detailed information on criteria used to meet measures
✓ Do not sunset supplemental payments but allow for a phased approach
✓ Promote incentives over penalties
Streamlined Modular Certification (SMC)
An updated toolkit.

The SMC would sunset both the Medicaid Enterprise Certification Toolkit (MECT) and the Medicaid Eligibility Toolkit (MEET) and provide an updated toolkit to State Medicaid agencies and their technology vendors.
Why does it matter?
SMC

The purpose of the SMC is to encourage accountability and to ensure the technology states are investing in are producing positive results for their Medicaid populations.
Who does it apply to?

The SMC will be most applicable to the State agencies and associated technology vendors in charge of creating the Advance Planning Document (APD) and Operational Advance Planning Documents (OAPD).
Trusted Exchange Framework and Common Agreement (TEFCA)
TEFCA Updates
What was released?

2 Standard Operating Procedures (SOPs) and 1 QHIN Application.
None of the information in the SOP is surprising or new, but it does go into much more detail on the “checklist” the QHIN must complete in the application process.
Types of Entities that Can Be a Participant or Subparticipant SOP

TEFCA

 ✓ A Covered Entity or its Business Associate
 ✓ A Government Health Care Entity or its agent or subcontractor
 ✓ A Health Care Provider or its agent or contractor, but not a Covered Entity nor a Government Health Care Entity
 ✓ A federal, state, local, or tribal agency, instrumentality, or other unit of government that determines whether an Individual qualifies for government benefits for any purpose other than health care (e.g. SSD) or its agent or contractor acting on its behalf
 ✓ A Public Health Authority or its agent or contractor
 ✓ An Individual Access Service Provider
 ✓ Any entity that contracts with and enables connectivity for any of the entities listed above
 ✓ If an entity is not included but is entitled to receive information under the exchange purposes, submit a request to the RCE to add to this list.
QHIN Application

TEFCA

✓ Corresponds to SOP on Application
✓ Able to begin application on rolling basis.