CMS IRF-PAI Software Developer/Vendor Call

Meeting Minutes

Thursday, July 6, 2017
Time: 3:00 p.m. to 4:00p.m. (ET)
Conference Call Number: 1-866-458-4949
Conference code: 299 76 314

Welcome ---**Brandy Barnette**

Welcome and thank you for joining our IRF-PAI software developer/vendor call related to the IRF-PAI Data submission of the IRF-PAI Item Set effective October 1, 2017.
If you do not have the agenda for this call, it may be found at https://www.qtso.com under the Vendors link on the left navigation bar then the IRF-PAI link in the navigation bar at the top of the page. On this call, we will cover the CMG Grouper updates, IRF-PAI Technical Data Submission Specification Updates, VUT information, ASAP system enhancements, and submitted Q and As. These updates and enhancements will be effective October 1, 2017. If time allows we will have an open Q and A session at the end of this call.
Please note that CMS policies related to the IRF Item Set are not the focus of the vendor calls.

I will now turn it over to John Jackson. John will provide some important information about the CMG Grouper updates.

CMG Grouper Updates – October 2017 ---**John Jackson**

A new CMG version, 3.00, is in the works that will be effective on October 1, 2017. Internal changes for comorbidities are currently in draft, but will be documented when they are finalized.
Note that there will be new functionality in the CMG. It will be possible to pass in an assessment in XML format or the fixed-length string format. Please check the technical documentation for details on the interface if you wish to use XML. The interface for fixed-length string will remain the same.

Data Submission Specification Updates ---**John Jackson**

A new, DRAFT version of the IRF-PAI Data Specifications was posted on the CMS Web Site on April 27, 2017. The version number is 2.01.0. These data specifications go into effect on October 1, 2017. As usual, there are new item values for ITM_SET_VRSN_CD (1.5) and SPEC_VRSN_CD (2.01).

We have three new items in the specs; however, the good news is that you probably don't have to care, as these items are in the Calculation section and used by CMS internally. They were added to support the upcoming transition from Medicare Number to Medicare Beneficiary Identifier (MBI). We also have two items, 27A and 27D, that have been removed.

We do have a new edit that replaces an existing edit on April 1, 2018. Edit -1130 replaces edit -1033 for validating item 2, but not until April 1, 2018. It allows for either the current Medicare Number to be entered for item 2, or to enter the new MBI value. Effective April 1, 2018, we will be in a transition period where CMS will be accepting either identifier for 2.

The transition period is currently scheduled to conclude at the end of 2019, after which time, only the MBI will be accepted.

There were some items for which the APU edit -5004 was applied and should not have been; please check the Edit Change Report to see the item list. Note that these changes are retroactive, you won't see -5004 appear for these items in corrections, either.

Please continue to check the IRF-PAI Software Information web page for any future updates…and to see when the DRAFT specs go to FINAL.

Validation Utility Tool--**John Jackson**
New data specifications mean a new Validation Utility Tool (VUT) is needed to enforce the new items and edits. Therefore, you can expect a new IRF-PAI VUT to be available in August 2017. As always, the IRF VUT will continue to support earlier data specification versions. Please note that the IRF VUT will contain the necessary code to handle the transition to edit -1130 in April 2018. An additional VUT release will not be necessary.

Per CMS direction, and effective with the next VUT release, the VUT will no longer perform a comparison of ICD codes from assessment items to a master list and provide a warning if the ICD is not found. ICDs will continue to be validated for formatting, as is done in ASAP.

ASAP System Enhancements -- **Jana Linthicum**
We will implement changes included in IRF data specs v2.01 into ASAP. The ASAP system will include the new MBI edit. Beginning April 1, 2018, the Heath Insurance Claim Number (HICN) or the Medicare Beneficiary ID (MBI) can be submitted in item 2 (Patient Medicare Number). Following the end of the SSNRI transition period, which is currently December 31,2019, the ASAP system will reject any IRF-PAI record that contains a value other than the MBI in item 2 (Patient Medicare Number).

The Assessment Print report will be updated to display the HICN/MBI Indicator field and data. This field indicates the type of value that was submitted in 2 (HICN or MBI Number).

The ASAP system will also be updated to use the new CMG Grouper, v3.00 for IRF-PAI assessments with a Target Date on or after October 1,2017.

Submitted Q and As--**Brandy Barnette**
Q1: The IRF-PAI Data Submission Specifications Overview document for Version 2.01.0 effective October 1, 2017 states the following regarding MBI:

Edit -1033 will remain in effect for item 2 for assessments with discharge date occurring BEFORE the beginning of the MBI transition period, currently set for April 1, 2018. For assessments with discharge date ON or AFTER the beginning of the MBI transition period, edit -1130 will be in effect for item 2.

Normally, CMS releases the VUT software program in September so that software vendors can validate the new data specification file. Since the format of what is allowed for the Medicare Number field in the data submission file is scheduled to change on April 1, 2018, will CMS be releasing a new version of the VUT software in March 2018 to allow software

vendors to test this change to the Medicare Number field, or with the VUT that will be released in September 2017 be sufficient for testing the MBI format?

A1: The VUT that is released in September will be able to handle the April transition to allowing the MBI format.

Q2: The IRF-PAI Data Submission Specifications (V2.01.0) overview document states that CMG grouper 2.91 needs to be used from 1st October 2017, but there are no updates to list of ICD for tier comorbidities. What are the updates for CMG 2.90 to CMG 2.91? And when will CMG related data files be published?

A2: At this time, we don't know what the final comorbidity changes will include. The new version of the CMG will be 3.00 which will include XML files as an allowable parameter.

Q3: Presumptive Methodology Files Timeline file is not published for the new proposed methodology files. What is timeline for the new 60% rule changes? Will these files replace the Presumptive Compliance -2 and Impairment Group Codes that meet Presumptive Compliance Criteria -2 files? Or will these be Presumptive Compliance - 3 and Impairment Group Codes that meet Presumptive Compliance Criteria -3 files extending the timeline?

A3: The comment period of the IRF PPS proposed rule closed on June 26, 2017. This question cannot be answered until after publication of the IRF PPS Final Rule.

Q4: Currently, CMS expects only zip files from Inpatient Rehab Facilities. Are there any plans to expose any interface to automate the submission process? Can vendor applications submit signed IRF-PAIs directly to CMS without manual intervention?

A4: Automated scripting of submissions is not allowed.

Open Q and A Session --**Brandy Barnette**
We will now open the call for any additional Questions & Answers. Anyone with questions please unmute your phone by entering *6. After you have completed your question please re-mute your line by entering *6.

Q1. Helen Davis stated right now they are downloading provider files for inpatient rehab, will the new provider file contain the MBI number and the data file in the one being sent or will it be a separate file?

A1. John replied now it is submitted with the HICN format and you will use the new MBI after April 1, 2018. Prior to that time only HICN will be accepted, after April 1, 2018, both will be accepted. January 1, 2019, only the MBI number will be accepted.

Helen is currently downloading software that has a provider file included with the download.

Jana stated that the MBI number is tied to the resident, not to the provider. Unless the provider file contains all of your residents in the IRF, then it would not be in there.

Q2. When will the files for CMG be released, is there an expected date? Will the data files also come with the Grouper update or will there be separate data files ready earlier than that?

A2. John does not have the exact date since we are in the development process, however, it will be towards the end of August once comorbidity changes are complete. It is possible there is more development to do. Regarding Grouper changes, you will receive test files and test cases that come with it. There are two big documentation files, one called program documentation and the other called technical documentation. They will list comorbidity and tiers and mention what is changed.

Closing Comments --Brandy Barnette
Thanks to today's speakers for their presentations, and to all participants for dialing in to learn about the changes coming up for IRF-PAI. We hope you have found the information presented helpful. Please send any technical questions to IRF Technical Issues Mailbox IRFTECHIssues@cms.hhs.gov. Please note the important resources listed at the bottom of today's agenda, which will also be included in the meeting minutes, which will be posted, on the Vendor - IRF Information Page https://www.qtso.com/vendorirf.html under the heading "IRF Software Developer/Vendor Call".

Important Resources
QTSO.com
- https://www.qtso.com
- https://www.qtso.com/vendor.html
- https://www.qtso.com/vendorirf.html

CMS.gov - IRF Quality Reporting
- http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Program-Details.html

CMS.gov - IRF Technical Information
- http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/InpatientRehabFacPPS/Software.html

Email – IRF-PAI Technical Issues
- IRFTechIssues@cms.hhs.gov

Listserv
- http://www.cms.gov/OpenDoorForums