



PDPM ACADEMY 2020

**BUILDING OPTIMAL
OPERATIONAL CAPACITIES[®]**

AHCA[®]
AMERICAN HEALTH CARE ASSOCIATION

PDPM Academy Open Discussion Forum (ODF)

November 17, 2020



PDPM Academy 2020 Offerings

<https://educate.ahcancal.org/2020PDPMAcademy>

- Seven pre-recorded, one-hour educational webinars starting in March 2020 with continuing education (CE) credits and accompanied by AHCA-developed guidance toolkits and other resources covering these topics:
 - *Holistic person-centered care planning (November 23, 2020)*
 - Evidence-based approaches for improving mobility (*available*)
 - *Effective care transitions at admission and discharge (December 2020)*
 - Trend Tracker and other sources to monitor the quality impact of PDPM (*available*)
 - Managing residents with complex nursing and NTA needs (*available*)
 - Restorative nursing and skilled maintenance nursing and therapy (*available*)
 - *Medical Director's Role in the SNF PDPM World (available)*
- Five live PDPM Academy Open Discussion Forums
- PDPM policy questions help desk: pdpm@ahca.org



CMS PDPM Updates Since September 29, 2020 ODF



CMS Updates Guidance for Medicare Part A SNF PPS PDPM Interrupted Stay Claims

MLN Matters article [MM11992](https://www.cms.gov/files/document/mm11992.pdf) effective April 2021 retroactive to 10/1/2019

- <https://www.cms.gov/files/document/mm11992.pdf>

Issue

- CMS system problems with some consolidated billing payments and PDPM VPD payments in claims

Who Impacted

- SNFs billing on Type of Bill (TOB) 21X and hospital swing bed providers billing on TOB 18X (subject to SNF PPS)

New Claims Processing Manual coding guidance

*“For claims that contain both covered days and noncovered days, and those noncovered days are the responsibility of the beneficiary (e.g., days submitted for noncovered level of care), the provider should **append span code 76** to indicate the days the beneficiary is liable.”*



CMS COVID-19 Billing Updates Since September 29, 2020 ODF



Public Health Emergency Extended

On October 2 the HHS Secretary Renewed COVID-19 PHE through January 20, 2021

“Renewal of Determination That A Public Health Emergency Exists

As a result of the continued consequences of Coronavirus Disease 2019 (COVID-19) pandemic, on this date and after consultation with public health officials as necessary, I, Alex M. Azar II, Secretary of Health and Human Services, pursuant to the authority vested in me under section 319 of the Public Health Service Act, do hereby renew, effective October 23, 2020, my January 31, 2020, determination that I previously renewed on April 21, 2020, that a public health emergency exists and has existed since January 27, 2020, nationwide.”

Be on the lookout during January for any additional extensions of the waivers – or if some waivers are modified or removed at <https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers>



CMS Updates COVID-19 FAQs on Medicare Fee-for-Service (FFS) Billing

<https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf>

Section Y. Skilled Nursing Facility Services

7. Question: If a new benefit period was granted pursuant to the section 1812(f) waiver, and the PHE ends in the middle of that new benefit period, would the beneficiary be entitled to the full 100 days of renewed SNF benefits, or would that entitlement end on the day the PHE ends?

Answer: If a beneficiary has qualified for the special one-time renewal of SNF benefits under the benefit period aspect of the section 1812(f) waiver while the section 1812(f) waiver is in effect, that reserve of 100 additional SNF benefit days would remain available for the beneficiary to draw upon even after the waiver itself has expired.

New: 10/20/20



CMS Updates SNF COVID-19 Benefit Period Waiver Billing Guidance

- MLN Matters Article [SE20011](https://www.cms.gov/files/document/se20011.pdf) Updated 11/9/2020 - IMPACTS
 - <https://www.cms.gov/files/document/se20011.pdf>
- The original benefit period must be completed before the benefit period waiver may be applied
- One-time benefit period waiver can be applied
 - Without interrupting a current stay (i.e. PHE prevents completion of care at day 100 and care continues day 101 and beyond)
 - After an interruption of skilled level of care following expiration of initial 100-day benefit period but not completion of 60-day break in spell-of-illness (same or different SNF)
- The entire 100-day extra benefit period is available (even with breaks of <60 days)
 - If the 100-day benefit period waiver is used, the remaining days are available if the PHE ends
 - Completion of the extra 100-day benefit period is only time the “BENEFITS EXHAUST” is placed in remarks field



Example Scenarios

Benefit Period Waiver Applies

1. Becomes COVID positive with symptoms on Day 90 of a stay and needs uninterrupted skilled care beyond day 100 to address new COVID-related condition
2. PT and OT held 2 weeks due to COVID isolation requirements preventing completion of rehabilitation plan of care by day 100
3. Discontinued skilled care after day 100, stayed in SNF for long-term care, 25 days later developed COVID-19 with symptoms that required resumption of skilled care
4. Discontinued skilled care after day 100 in a separate SNF, stayed in SNF for long-term care, 25 days later developed COVID-19 with symptoms that required resumption of skilled care
5. Discharged home after 100 skilled days. 40 days later fell and broke shoulder and requires skilled care

Note: The entire extra 100 days can be used including periodic interruptions



Example Scenarios

Benefit Period Waiver Does Not Apply

1. Used 70 skilled days in a SNF under normal coverage rules and went home for <60 days then developed any condition that requires skilled care

Reason: The 3-Day qualifying hospital stay (QHS) waiver could apply to admit, but beneficiary must use the remaining 30 skilled days available in the original benefit period before a benefit period waiver could be requested.

2. Used all 100 days of a previously requested additional 100 days under the benefit period waiver

Reason: The benefit period waiver can only be used one time per beneficiary

Note: Unused benefit period waiver days cannot be carried over unto a next spell-of-illness (i.e. break in skilled care >60 days). Once a break of over 60 days occurs, the beneficiary is eligible for the normal traditional 100-day benefit period.



AHCA 3-Day Stay and Benefit-Period Waivers for Medicare Part A SNF PPS

- Fact Sheet

<https://www.ahcancal.org/Survey-Regulatory-Legal/Emergency-Preparedness/Documents/COVID19/3-Day%20Waiver%20FAQ.pdf>

- Webinar: COVID-19 - Overview of SNF 3-Day Stay and Benefit Period Waivers

<https://educate.ahcancal.org/products/covid-19-overview-of-snf-3-day-stay-and-benefit-period-waivers>



Key CMS/AHCA COVID-19 Resources

AHCA COVID-19 page:

https://www.ahcancal.org/facility_operations/disaster_planning/Pages/Coronavirus.aspx

- AHCA COVID-19 email:

COVID19@ahca.org

- CMS COVID-19 main page:

<https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>

- CMS COVID:19 waivers page:

<https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers>

- CMS COVID-19 billing & coding guidance FAQs:

<https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf>

- CDC COVID-19 guidance for healthcare facilities:

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/us-healthcare-facilities.html>



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Please submit questions as described by our webinar moderator