



WASHINGTON

perspectives

**An Analysis and Commentary on Federal Health Care Issues
by Larry Goldberg**

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CMS Issues Correction Rule to FY 2022 Inpatient Psychiatric PPS Update



The Centers for Medicare and Medicaid Services (CMS) have issued a correction rule to the August 4, 2021 final FY 2022 Inpatient Psychiatric Facilities Prospective Payment System (PPS) Update rule. The 16-page document is available at: <https://public-inspection.federalregister.gov/2021-21546.pdf>. Publication in the **Federal Register** is scheduled for October 4.

There are 2 major items being corrected. First, the outlier fixed dollar loss threshold amount is changed from "\$14,470" to "\$16,040". Second, based on the corrected calculation of the outlier fixed dollar loss threshold amount, the correct estimate of increased transfers from the federal government to IPF providers should be \$70 million. In other words, the outlier threshold increase will result in \$10 million less in FY 2022 payments than previously quoted.

Additionally, CMS is making several changes to footnotes in the August rule regarding quality program items. Also, CMS is revising the rule's table 7 to read as follows:

TABLE 7: Patient-level data submission requirements for CY 2014 IPFQR Program measure set

NQF #	Measure ID	Measure	Patient-Level Data Submission
0640	HBIPS-2	Hours of Physical Restraint Use	Yes, numerator only
0641	HBIPS-3	Hours of Seclusion Use	Yes, numerator only
0560	HBIPS-5	Patients Discharged on Multiple Antipsychotic Medications with Appropriate Justification	Yes
0576	FUH	Follow-Up After Hospitalization for Mental Illness	No (claims-based)
N/A	SUB-2 and SUB-2A	Alcohol Use Brief Intervention Provided or Offered and SUB-2a Alcohol Use Brief Intervention	Yes

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NQF #	Measure ID	Measure	Patient-Level Data Submission
N/A	SUB-3 and SUB-3a	Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a Alcohol and Other Drug Use Disorder Treatment at Discharge	Yes
N/A	TOB-2 and TOB-2a	Tobacco Use Treatment Provided or Offered and TOB-2a Tobacco Use Treatment	Yes
N/A	TOB-3 and TOB-3a	Tobacco Use Treatment Provided or Offered at Discharge and TOB-3a Tobacco Use Treatment at Discharge	Yes
1659	IMM-2	Influenza Immunization	Yes
N/A	N/A	Transition Record with Specified Elements Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)	Yes
N/A	N/A	Screening for Metabolic Disorders	Yes
2860	N/A	Thirty-Day All-Cause Unplanned Readmission Following Psychiatric Hospitalization in an Inpatient Psychiatric Facility	No (claims-based)
3205	Med Cont	Medication Continuation Following Inpatient Psychiatric Discharge	No (claims-based)
TBD	COVID HCP	COVID-19 Healthcare Personnel (HCP) Vaccination Measure	No (calculated for HCP)

Please note the table head says, "2014." The August 4 rule identifies table 7 as the CY 2024 IPFQR Program measure set. No doubt this is another error.

Final comment

It is good that CMS has found and is correcting these items. However, an error in a correction notice is not helpful.