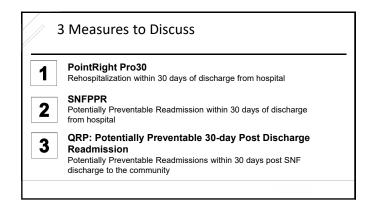
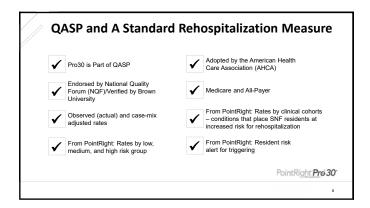
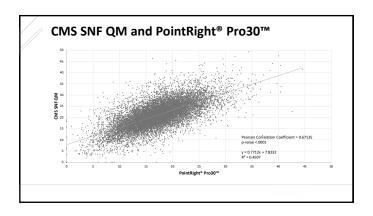


| /                     | HRRP     | Rehosp<br>QM | SNF RM   | SNF PPR<br>? FY2020? | SNF QRP<br>NPRM | Pro 30™    | Pro<br>LongStay ™ | Hosp QM  |
|-----------------------|----------|--------------|----------|----------------------|-----------------|------------|-------------------|----------|
| 30 days post admit    |          | <b>✓</b>     | <b>✓</b> | <b>✓</b>             |                 | <b>✓</b> * |                   |          |
| 30 days post D/C      | <b>✓</b> |              |          |                      | ✓               |            |                   |          |
| Medicare FFS Only     | <b>√</b> | ✓            | ✓        | ✓                    | <b>✓</b>        |            |                   | <b>√</b> |
| 100 Days In SNF       |          |              |          |                      |                 |            | V                 | <b>✓</b> |
| Risk Adjusted         | <b>√</b> | <b>√</b>     | ✓        | <b>✓</b>             | <b>√</b>        | <b>V</b>   | V                 | <b>V</b> |
| MDS-Based             |          |              |          |                      |                 | <b>V</b>   | V                 |          |
| Claims-Based          | <b>√</b> | <b>√</b>     | ✓        | <b>✓</b>             | <b>√</b>        |            |                   | ✓        |
| Excludes Planned      | <b>√</b> | <b>√</b>     | <b>V</b> | ✓                    | <b>√</b>        |            |                   | <b>√</b> |
| Potential Preventable |          |              |          | <b>✓</b>             | <b>V</b>        |            |                   |          |
| Excludes Observation  |          |              | ✓        | <b>✓</b>             | <b>√</b>        |            |                   |          |
|                       |          |              |          |                      |                 | H)         |                   |          |

|                       | HRRP         | Rehosp<br>QM | SNF RM   | SNF PPR<br>? FY2020? | SNF QRP<br>NPRM | Pro 30™    | Pro<br>LongStay ™ | Hosp QM  |
|-----------------------|--------------|--------------|----------|----------------------|-----------------|------------|-------------------|----------|
| 30 days post admit    |              | <b>_</b>     | <b>✓</b> | <b>V</b>             |                 | <b>√</b> * |                   |          |
| 30 days post D/C      | <b>✓</b>     |              |          |                      | ✓               |            |                   |          |
| Medicare FFS Only     | <b>√</b>     | <b>V</b>     | <b>✓</b> | ✓                    | <b>✓</b>        |            |                   | <b>✓</b> |
| 100 Days In SNF       |              |              |          |                      |                 |            | <b>V</b>          | <b>~</b> |
| Risk Adjusted         | $\checkmark$ | <b>~</b>     | ✓        | ✓                    | ✓               | <b>V</b>   | <b>V</b>          | <b>✓</b> |
| MDS-Based             |              |              |          |                      |                 | <b>V</b>   | V                 |          |
| Claims-Based          | <b>√</b>     | <b>✓</b>     | ✓        | ✓                    | ✓               |            |                   | <b>√</b> |
| Excludes Planned      | ✓            | <b>√</b>     | <b>✓</b> | ✓                    | ✓               |            |                   | ✓        |
| Potential Preventable |              |              |          | <b>✓</b>             | <b>✓</b>        |            |                   |          |
| Excludes Observation  |              |              | ✓        | <b>V</b>             | ✓               |            |                   |          |
|                       |              |              |          |                      |                 |            |                   |          |





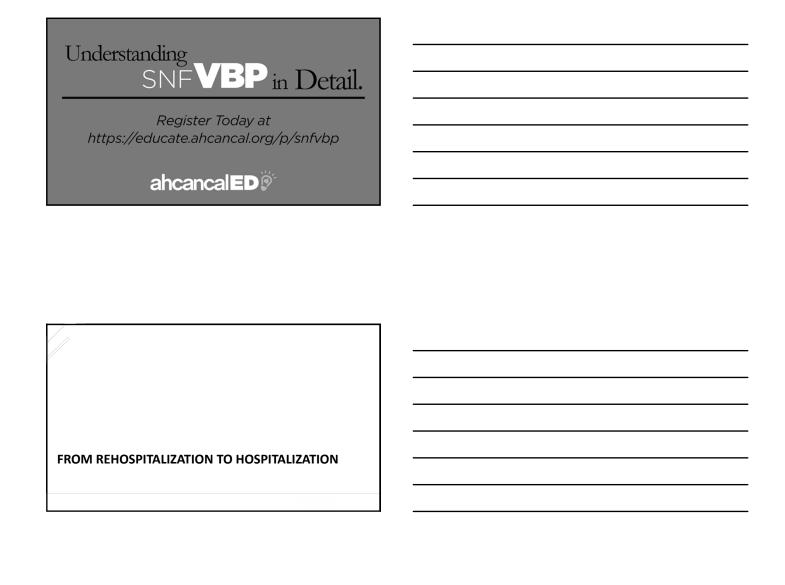




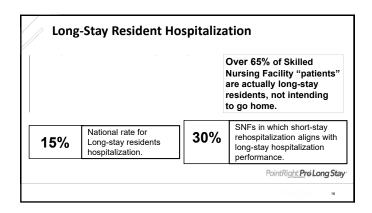
Comment: Some commenters expressed concern that SNFs will not have access to the data used to calculate the SNFRM, and will therefore not be able to validate CMS's calculations.

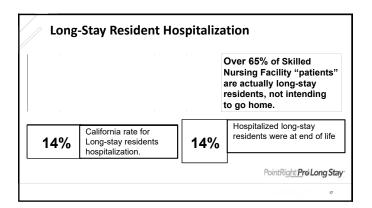
Response: While we intend to make as much information related to SNFRM performance as possible available to SNFs through confidential quarterly feedback reports required under section 1888(g)(5) of the Act, we understand that claims based quality measurement is difficult for providers to replicate. It would require familiarity with a number of data sources that are used to develop the risk-adjustment model for SNFRM in order to account for variation across SNFs in case-mix and patient characteristics predictive of readmission (including the MedPAR, Medicare Enrollment Database (EDB), Medicare Denominator files, Agency for Healthcare Research & Quality (AHRQ)'s Clinical Classification Software (CCS) groupings of ICD-9 codes, and CMS's hierarchical condition category (HCC) mappings of ICD-9 codes). We view this as a necessary compromise to minimize reporting burden on participating SNFs by using claims data while ensuring that we obtain timely data for quality measurement.

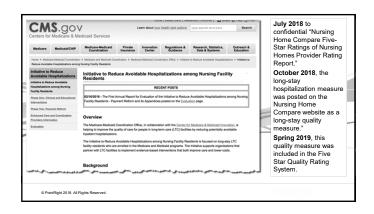
|            |      | PointRig                         | ght® Pro 30®   |
|------------|------|----------------------------------|--|
|            |      | Low                              | High   |
| IF QM      | нібн | Rehosp occurs post SNF discharge | What the What?   |
| CMS SNF QM | LOW  | You're Awesome                   | ,<br>More rehosp than others<br>Planned readmissions may play a role |





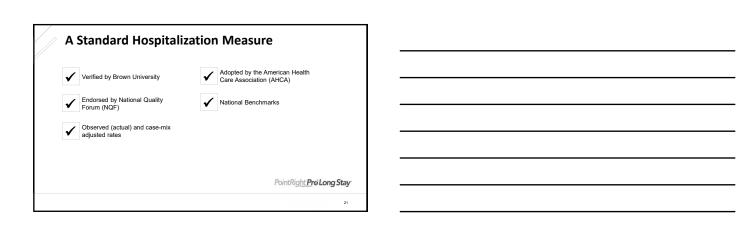


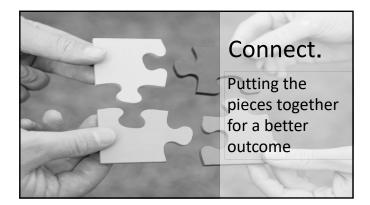




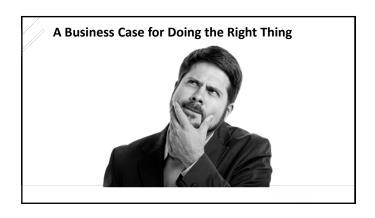
| NUMBER OF HOSPITALIZATIONS PER 1,000 LONG-STAY RESIDENT<br>DAYS   | • | CMS number of            |
|---|---|--------------------------|
| Measure Name  |   | hospitalizations per     |
| The measure name is Number of Hospitalizations per 1,000 Long-Stay Resident Days.   |   | 1,000 long-stay resident |
| Purpose of Measure  |   | days                     |
| If a nursing home sends many residents back to the hospital, it may indicate that the nursing home is not properly assessing or taking care of its residents who are admitted to the nursing home from a hospital.                      | • | Residents >100 days      |
| This claims-based quality measure will be reported on Nursing Home Compare starting in October 2018, and integrated into the Five-Star Quality Rating System in April 2019. It reports the ratio of unplanned                           | • | Claims-based             |
| had incipated into the Pre-Ostal Quality Raning System in April 2015. Texports the ratio of unplanted hospitalizations per 1,000 long-stay resident days. This document describes the specifications for this measure.                  | • | MDS used for case-mix    |
| Measure Description and Specifications  |   | adjustment               |
| The long-stay hospitalizations measure determines the number of unplanned inpatient admissions or outpatient observation stays that occurred among permanent (i.e. long-stay) residents of a nursing home                               | • | Key exclusions, such as  |
| during a one-year period, expressed as the number of unplanned hospitalizations for every 1,000 days that the long-stay residents were admitted to the facility (i.e. "long-stay resident days"). Higher values of the                  |   | hospice                  |
| long-stay hospitalizations measure indicate worse performance on the measure. See Table 4 for detailed specifications for the measure.  | • | Includes observation     |
| Numerator: The numerator for the measure is the number of admissions to an acute care or critical access hospital, for an inpatient or outpatient observation stay, occurring while the individual is a long-term nursing home resident |   | stay                     |
|   |   |                          |
|   |   |                          |



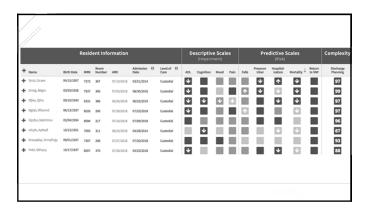


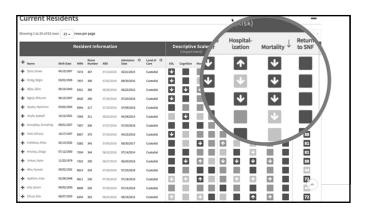


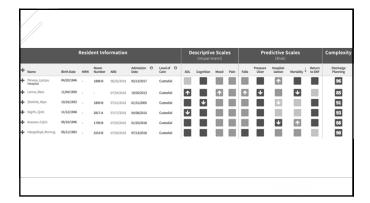
| Facility Information | Observed Pro30 Rehos                                  | pitalization Impact   | Adjusted ProLong Stay Impact                         |   |  |  |
|----------------------|---|---|--|---|--|--|
| County Name          | Market's Median Observed<br>Rehospitalization (Pro30) | Additional Annual Admissions if Improve Below Median (per 100 beds) | Market's Median<br>Hospitalization<br>(ProLong Stay) | Additional Admissions i<br>Improve Below Mediar<br>(per 100 beds) |  |  |
| Stanislaus           | 14.9%   | 176   | 15.2%  |   |  |  |
| Los Angeles          | 19.0%   | 105   | 19.0%  | 86  |  |  |
| Merced               | 14.9%   | 176   | 15.2%  |   |  |  |
| Madera               | 14.9%   | 176   | 15.2%  |   |  |  |
| Orange               | 14.3%   | 149   | 15.5%  | 150   |  |  |
| San Diego            | 14.5%   | 145   | 14.7%  | 196   |  |  |
| Tulare               | 19.5%   | 162   | 16.9%  |   |  |  |
| Kern                 | 19.5%   | 162   | 16.9%  |   |  |  |
| Del Norte            | 11.7%   | 169   | 11.6%  |   |  |  |
| Sonoma               | 11.8%   | 238   | 8.4%   |   |  |  |
| Imperial             | 14.5%   | 145   | 14.7%  | 196   |  |  |

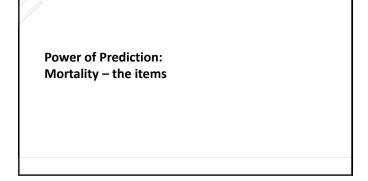


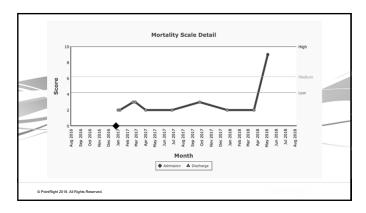




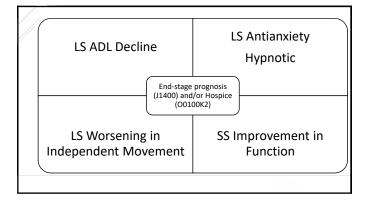


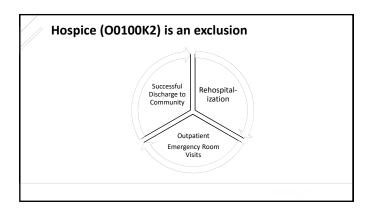






| 5- day Assessment   |                   |             | 14 - day /        | Assessment  | 30 - day          | / Assessment | 60 - day Assessment |               |
|---------------------|-------------------|-------------|-------------------|-------------|-------------------|--------------|---------------------|---------------|
| Model<br>score Rank | Predicted<br>Prob | Actual Rate | Predicted<br>Prob | Actual Rate | Predicted<br>Prob | Actual Rate  | Predicted<br>Prob   | Actua<br>Rate |
| 10                  | 68.71%            | 70.14%      | 62.58%            | 68.18%      | 58.07%            | 68.33%       | 69.54%              | 69.35         |
| 9                   | 51.71%            | 54.35%      | 49.79%            | 54.10%      | 48.86%            | 54.04%       | 50.00%              | 54.15         |
| 8                   | 42.29%            | 44.33%      | 40.97%            | 44.20%      | 39.35%            | 44.11%       | 40.18%              | 44.11         |
| 7                   | 33.80%            | 34.35%      | 33.66%            | 34.25%      | 30.76%            | 34.12%       | 31.36%              | 34.08         |
| 6                   | 27.91%            | 27.32%      | 27.82%            | 27.30%      | 26.47%            | 27.26%       | 25.02%              | 27.26         |
| 5                   | 23.18%            | 22.31%      | 23.54%            | 22.27%      | 22.30%            | 22.24%       | 20.42%              | 22.24         |
| 4                   | 17.95%            | 17.30%      | 18,76%            | 17.24%      | 16.95%            | 17.22%       | 16.13%              | 17.26         |
| 3                   | 12.43%            | 12.26%      | 12.97%            | 12.20%      | 12.09%            | 12.18%       | 10.70%              | 12.18         |
| 2                   | 6.72%             | 7.65%       | 7.06%             | 7.27%       | 6.61%             | 7.21%        | 6.01%               | 7.21          |
| 1                   | 3.82%             | 4.73%       | 3.31%             | 4.30%       | 3.02%             | 4.24%        | 3.12%               | 4.22          |







## The PDPM Tie In

- Rehospitalization may impact your PDPM Rate
- All reported hospitalization utilization measures remain intact
- The value of untethered therapy and ancillaries in preventing rehospitalization

QUESTIONS

Steven Littlehale Chief Clinical Officer -Emeritus

Steven@stevenlittlehale.com

Cathy Fratello
National Business Development
Executive
661.904.6398

cathy.fratello@pointright.com

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