FY 2022 SNF Proposed Payment Rule

April 21, 2021





2022 Payment Increase 1.3%

- True market basket showed 2.3% increase
- Productivity adjustment of -0.2%
- Forecast error of -0.8%
- We will verify forecast error
- If verified this was maximum possible





PDPM Recalibration

- CMS data showed overpayment for last two years of 5.3% or 5.0%
 - They chose 5.0%
- CMS bound by budget neutrality
 - Their language is very different from 2011
 - CMS specifically states no claw back
 - CMS offered some outs





Outs Offered by CMS

Approach	Glidepaths offered by CMS
Delay	No Change in FY22 and Full 5% in FY 2023
Phased	 CMS Option 1 (2 Year): FY22 – 2.5% and FY23 – 2.5% CMS Option 2 (5 Year): 1% Per FY for 2022 – 2026
Combined	No Change in FY22 and Phased Down Some % Per Year Over Some Number of FYs





Our Strategy Options

- Verify budget neutrality amount
- Advocate for longest possible delay/phase-in o5-year glidepath
- Hill strategy of encouraging Secretary take longer delay





How Can You Help?

- We need members to submit comments
 - oComments are due to CMS by June 7
 - OSubmit as early as possible
 - CMS has quick turn-around
 - oComment letter from each company
 - Signed by CEO





- Visit our Advocacy Action Center: https://www.votervoice.net/AHCA/home
- Add personalizing information
 - o Your facilities & operations
 - o Your geographic information
 - o Your residents
- Pandemic challenges
 - o Include data and personal stories about your experience
- Increased costs & lost income
 - o Census concerns





- CMS take more time to evaluate
- CMS use combined approach
 - o Delay implementation of adjustment for 2 years
 - o Phase-in by no more than 1% annually



