



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, Washington 98504-5600

April 28, 2023

AL TSA: NH #2023-020

UPDATES TO THE NURSING HOME CARE COMPARE WEBSITE AND FIVE STAR QUALITY RATING SYSTEM: ADJUSTING RATINGS BASED ON ERRONEOUS SCHIZOPHRENIA CODING AND POSTING DISPUTE RESOLUTION INFORMATION

Dear Nursing Facility/Home Administrator:

In 2008, the Centers for Medicare and Medicaid Services (CMS) added the Five-Star Quality Rating System to the CMS Nursing Home Compare website. One of the quality measures (QM) included in the rating calculation is the percentage of long-stay residents who are receiving antipsychotic drugs. This measure excludes residents with diagnoses of schizophrenia, Huntington's disease, or Tourette syndrome.

The Informal Dispute Resolution (IDR) process gives nursing homes an opportunity to dispute citations. Additionally, when CMS imposes a civil monetary penalty, providers have the opportunity to request an Independent IDR (IIDR). Currently, citations under IDR and IIDR are not posted publicly on the Nursing Home Compare and the Quality Certification and Oversight Reports (QCOR) website until the dispute is resolved. This process takes approximately 60 days.

On January 18, 2023, CMS released [QSO-23-05-NH](#), discussing the adjustments to QM ratings based on erroneous schizophrenia coding and posting citations under IDR and IIDR.

Schizophrenia Diagnosis Coding Audits

As a result of the CMS pilot audit to test the effectiveness of the Minimum Data Set (MDS) audit process, CMS found several issues related to inaccurate MDS coding for schizophrenia diagnoses. When nursing home residents are given erroneous schizophrenia diagnoses, they are subject to poor care and unnecessary antipsychotic medications, both of which can be dangerous. Additionally, inaccurate coding misleads the public by misrepresenting the nursing home's rate of antipsychotic usage in the posted quality measure. Therefore, CMS is conducting offsite audits of schizophrenia coding. Based on the results, CMS will adjust the quality measure star ratings for facilities whose audits reveal inaccurate coding. This is also identified in CMS's [Fact Sheet](#) that "CMS will launch a new effort to identify problematic diagnoses and refocus efforts to continue to bring down the inappropriate use of antipsychotic medications."

Facilities selected for an audit will receive a letter explaining the audit purpose and process, and instructions for providing supporting documentation. During the audit process, facilities will have the opportunity to ask questions and seek clarification. Additionally, at the conclusion of the audit, the facility will have the opportunity to discuss the audit results with CMS.

Facilities that have coding inaccuracies identified through the schizophrenia audit will have their QM ratings adjusted as follows:

- The Overall QM and long stay QM ratings will be downgraded to one star for six months (this drops the facility's overall star rating by one star).
- The short stay QM rating will be suppressed for six months.
- The long stay antipsychotic QM will be suppressed for 12 months.

ALTSA Provider Letter: **UPDATES TO THE NURSING HOME CARE COMPARE WEBSITE AND FIVE STAR QUALITY RATING SYSTEM: ADJUSTING RATINGS BASED ON ERRONEOUS SCHIZOPHRENIA CODING AND POSTING DISPUTE RESOLUTION INFORMATION**

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Nursing homes should work with their psychiatric providers and medical directors to ensure the appropriate professional standards and processes are implemented related to diagnosing individuals with schizophrenia. Information is available in [Appending PP](#) of the State Operations Manual (F Tags 658, 740, and 758) and the [MDS 3.0 RAI User's Manual \(v1.17.1R\) Errata \(v2\), Effective July 15, 2022](#)). Providers may also contact their Quality Improvement Organization for additional resources, tools, and assistance at [Locate Your QIO](#).

Citations Under Informal Dispute Resolution and Independent Informal Dispute Resolution

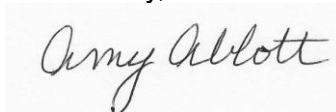
Waiting a minimum of 60 days for the citations to be posted pending an outcome of the IDR or IIDR leaves consumers without knowledge of serious citations. Therefore, to be more transparent CMS will now display these citations on Nursing Home Compare with a note that they are under dispute by the nursing home.

CMS will update the [Five Star Rating Technical Users' Guide](#) and [Chapter 7 of the State Operations Manual](#) to reflect these changes.

For questions about the schizophrenia MDS audits, please contact DNH_BehavioralHealth@cms.hhs.gov.

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Molly McClintock, Nursing Home Policy Program Manager, at (360) 742-6966 or molly.mcclintock@dshs.wa.gov.

Sincerely,



Amy Abbott, Director
Residential Care Services

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