

SNF WQIP PL 25-005

DATE: May 13, 2025

TO: ALL SNF WQIP PARTICIPANTS

SUBJECT: SNF WQIP Interim Payment CY2024 Update

PURPOSE:

This Policy Letter (PL) outlines the potential updated methodology for the forthcoming Skilled Nursing Facility (SNF) Workforce and Quality Incentive Program (WQIP) Interim Payment for Program Year 2 (PY2, 2024).

BACKGROUND:

The Department of Health Care Services (DHCS) and its contractor, Health Services Advisory Group (HSAG), utilize the Minimum Data Set (MDS) through the Centers for Medicare and Medicaid Services (CMS) for SNF WQIP. Recently, CMS removed HSAG's access to MDS data. DHCS and HSAG immediately started the process to obtain access to the MDS data via a different method.

The work with CMS to obtain MDS data continues, but the process is taking longer than expected due to multiple factors outside of DHCS's control. Given this, DHCS notified SNF interest holders via email distribution list (ListServ) on March 28, 2025, that the SNF WQIP Interim Payment for PY2 (2024) is delayed. The Interim Payment report would have been released in March 2025.

HSAG currently has access to MDS assessments submitted through August 31, 2024. However, the full look forward period (i.e., Q3 2024) needed to calculate MDS Data Completeness requires submissions through November 30, 2024, to determine if residents had any additional assessments after the 150-day exclusion period. With the current methodology outlined in the [SNF WQIP PY2 \(2024\) Technical Program Guide](#), if a facility submits a non-admission assessment for a resident after the 150-day period that is not the start of a true new admission, then the resident will be considered to still be in the facility and will be included in the denominator for all prior quarters (as this indicates that they were present in the facility without assessments being completed).

POLICY:

DHCS and HSAG assessed the potential impact of using limited data for MDS Data Completeness using PY1 (2023) rates. HSAG limited the look forward period for the PY1 (2023) MDS data to assessments submitted through August 31, 2023 (rather than November 30, 2023, for the full look forward quarter) to mirror the MDS data we currently have available for PY2 (2024). After limiting the data for PY1 (2023), most facilities were not impacted, and no facilities were negatively impacted.

DHCS will utilize MDS data currently available for CY2024 (i.e., assessments submitted with submission dates through August 31, 2024) to ensure that the SNF WQIP Interim Payment can move forward, despite the lack of MDS data availability. Please note, the limited data for MDS Data Completeness (i.e. assessments submitted with submission dates through August 31, 2024) will be used in the PY2 Final Report as well to avoid overpayment. DHCS anticipates disseminating and publishing the PY 2 (CY2024) SNF WQIP Interim Payment Report by the end of May 2025.

Feedback on this methodology was due via email to the SNF WQIP Inbox SNFWQIP@DHCS.ca.gov no later than May 7, 2025.

ORIGINAL SIGNED BY JEFFREY NORRIS, MD

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