

SNF WQIP PL 25-004

DATE: April 14, 2025
TO: ALL SNF WQIP PARTICIPANTS
SUBJECT: SNF WQIP Staffing Turnover Metric Updated Methodology for PY 2 (CY 2024)

PURPOSE:

This Policy Letter (PL) outlines the plan to update the *Staffing Turnover* metric methodology in the Skilled Nursing Facility (SNF) Workforce and Quality Incentive Program (WQIP) for program year (PY) 2 (calendar year [CY] 2024).

BACKGROUND:

In the July 2024 Care Compare data refresh, the Center for Medicare and Medicaid Services (CMS) changed the *Staffing Turnover* methodology to define individuals who no longer work at a facility as those with a period of at least 90 consecutive days during which they did not work at all. This is an update from the previous methodology, which used a gap period of 60 days.

The Department of Health Care Services (DHCS) and its contractor, Health Services Advisory Group (HSAG), assessed the impact of switching the benchmarks for the metric in PY 2 (2024) from prospective (i.e., baseline period of 4/1/2022-3/31/2023, as shown in the [PY 2 WQIP Technical Program Guide](#)) to retrospective (i.e., benchmarks based on percentiles calculated using PY 2 rates for the WQIP population). When switching from prospective to retrospective benchmarks for PY 2, facilities either maintained their scores for the *Staffing Turnover* metric or showed a decline when using retrospective benchmarks. Please note, all testing was done using preliminary rates from the January 2025 Care Compare refresh (i.e., measurement period of 7/1/2023-6/30/2024) as data from the full measurement period (10/1/2023-9/30/2024) were not yet available. As a result, the final PY 2 results may differ slightly from the results of the impact assessment.

POLICY:

To mitigate the potential negative impact on facilities caused by the CMS's updated methodology, DHCS will adopt a flexible approach of awarding facilities with the better

of the two scores that they would earn using the prospective benchmarks and retrospective benchmarks. This approach will allow facilities to earn the highest possible points based on the final PY 2 rates and it will avoid penalizing facilities due to CMS' methodology change.

For example, if a facility would have earned 6 points for the *Staffing Turnover* metric using the prospective benchmarks originally listed in the PY 2 WQIP Technical Program Guide, but only earned 2 points using the retrospective benchmarks, the facility's raw score would be the higher of the two (i.e., 6 points).

Table 1: Staffing Turnover Better of Two Scores Methodology Examples

Facility	Score based on Prospective Benchmarks	Score based on Retrospective Benchmarks	Final score for PY 2
Example Facility 1	6	2	6
Example Facility 2	4	1	4
Example Facility 3	0	2	2
Example Facility 4	5	5	5

Feedback on this methodology was due via email to the SNF WQIP Inbox SNFWQIP@DHCS.ca.gov no later than April 9, 2025.

ORIGINAL SIGNED BY JEFFREY NORRIS, MD

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