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MEMORANDUM

TO: RHCF Members

FROM: Dan Heim, Executive Vice President
Darius Kirstein, Director of Financial Policy & Analysis

DATE: August 17, 2018

SUBJECT: Medicare SNF PPS Final Rule for FY 2019

ROUTE TO: Administrator, Department Heads, Business Office

Introduction

This memo summarizes the Skilled Nursing Facility (SNF) Prospective Payment System (PPS) [final rule for federal fiscal year \(FY\) 2019](#) (CMS-1696-F) published on Aug. 8, 2018 by the Centers for Medicare and Medicaid Services (CMS). The rule includes updates to SNF Medicare Part A rates, SNF Value-Based Purchasing (VBP) and the SNF Quality Reporting Program (QRP), both of which will impact Part A rates for the first time this fall. Rates established by the final rule go into effect for cost reporting periods beginning on or after Oct. 1, 2018.

Most notably, the rule details a new Medicare Part A reimbursement methodology, the Patient Driven Payment Model (PDPM), which will be implemented in Oct. 2019. PDPM will replace the current 66 payment categories of the RUG-IV methodology with a new, more targeted case-mix classification system designed to more accurately align payment with resident care needs. The primary goal of PDPM is to base Part A payments on objective resident characteristics that are predictive of service needs rather than on the amount of services provided. We outline the PDPM methodology in a separate memo that will be distributed next week. A CMS fact sheet on the entire final rule is available [here](#).

In this memo, LeadingAge NY is providing members with:

- A summary of the factors impacting the SNF PPS rates and related programmatic issues;
- Directions on using the LeadingAge national SNF PPS rate tool;
- An update on changes to the wage index;

- Listings of 2018 SNF PPS rates by New York State region, including the enhanced AIDS/HIV rates (i.e., 228 percent of the base rates); and
- Brief summaries of changes being made to the SNF VBP and QR Programs, and other program related clarifications included in the final rule.

Medicare Part A Rate

Nursing homes will see a 2.4 percent increase in their Medicare Part A base rates in October 2018, a nationwide increase of approximately \$820 million. The rule implements a provision in the Bipartisan Budget Act of 2018 (BBA) requiring that rates be increased by a 2.4 percent "market basket" adjustment to account for inflation. Absent the BBA provision, the inflation adjustment calculation would have yielded a 2 percent increase.

In contrast, last year's market basket adjustment was lower than what the inflation calculation would have yielded. The increase effective Oct. 2017 after adjustments would have been 2.0 percent, but was limited to 1 percent (i.e., a \$300 million increase in payments nationally) by a provision of the Medicare Access and CHIP Reauthorization Act of 2015.

A Market Basket Forecast Error (MBFE) Adjustment, a mechanism to reconcile the projected to the actual inflation adjustment from two years' prior, is not applied this year because the difference between the projected and actual 2017 increase is less than the established threshold where an adjustment is required.

For purposes of the MBFE calculation for FY 2017 (the most recently available FY for which there is final data), the estimated increase in the market basket index was 2.7 percentage points, the same as the actual increase for FY 2017. Accordingly, as the difference between the estimated and actual amount of change in the market basket index does not exceed the 0.5 percentage point threshold, the FY 2019 market basket percentage will be not adjusted to account for the 2017 forecast error. Table 1 shows the forecasted and actual market basket amounts for FY 2017.

Table 1. Calculation of MBFE Based on FY 2017 Data

Actual MBI Increase	Projected Increase	Difference between Projected & Actual
2.7 %	2.7 %	(0.0)
<i>Because 0.0 is below the 0.5 threshold, no MBFE for is applied to the FY 2019 rates</i>		

With the net 2.4 percent increase, overall Medicare Part A payments are set to increase (subject to wage index-driven variation). However, providers should note and budget for the ongoing impact of "sequestration." Medicare provider payments were cut by two percent beginning April 1, 2013 as part of the spending reductions required by the Budget Control Act of 2011 (i.e., sequestration). Note that this reduction is not reflected in the rate schedule but is a two percent reduction to Medicare payments made to a provider. Absent Congressional action, sequestration will continue to reduce Medicare payments by two percent until 2022.

Please note that the actual rate increase effective Oct. 2018 will vary by region based on the annual update to the Medicare wage index. The implementation of the SNF VBP Program (discussed below) will

also impact this year's Medicare Part A rates, and homes subject to QRP penalties will have their market basket adjustment reduced by two percentage points.

LeadingAge Rate Tool

As always, [LeadingAge](#) is providing members with their free SNF PPS Rate Calculator. This is an Excel™ spreadsheet that provides the Medicare Part A rates by county, and is available with member log-in by [clicking here](#). The spreadsheet allows members to insert their estimated Medicare days per Minimum Data Set (MDS) Resource Utilization Group (RUG IV) category and project Medicare revenue. (Please note that the 2019 coinsurance amounts are not yet available, so the calculator shows 2018 amounts).

This year's tool incorporates a VBP adjustment by allowing providers to enter their SNF VBP Incentive Payment Multiplier (recently distributed to providers on their VBP Annual Performance Score Reports) into the template. If any member has difficulty accessing the tool, please contact Darius Kirstein at LeadingAge NY for assistance at dkirstein@leadingageny.org or call 518-867-8841.

Please note the following instructions from LeadingAge:

To Start, download the Excel file from the LeadingAge Web site. Once downloaded:

- *Start by opening either the urban or rural page and using the click-down menu to search by county.*
- *Note that there may be multiple counties in different states with the same name. The calculator is arranged in alphabetical order by county and then by state. Start with the county name and then follow the county list to find your respective state.*
- *Counties will appear on either the rural or urban page – no county is duplicated across the two lists and if it doesn't appear on one, it will be on the other.*

Please note that the calculator reflects the wage index values published in the final rule.

Programmatic Issues

The SNF PPS rule addresses two other programmatic issues in a similar way as the previous year.

- ***Administrative Presumption***

CMS continues the administrative presumption of coverage for individuals scoring in one of the upper 52 RUG-IV (out of 66) categories on the initial 5-day and subsequent Medicare required assessments. The presumption automatically classifies these individuals as meeting the skilled level of care needed for Medicare Part A coverage if they are categorized in the following RUG-IV categories: (1) Rehabilitation plus Extensive Services; (2) Ultra High Rehabilitation; (3) Very High Rehabilitation; (4) High Rehabilitation; (5) Medium Rehabilitation; (6) Low Rehabilitation; (7) Extensive Services; (8) Special Care High; (9) Special Care Low; and (10) Clinically Complex.

In the rules CMS notes that this administrative presumption policy does not supersede the SNF's responsibility to ensure that its decisions relating to level of care are appropriate and timely, including a review to confirm that the services prompting the beneficiary's assignment to one of the upper 52 RUG-IV groups (which, in turn, serves to trigger the administrative presumption) are themselves medically necessary.

An individual scoring in one of the lower 14 RUG-IV categories is not automatically assumed to meet the skilled level of care and must be evaluated on an individual basis to trigger Part A coverage.

Starting this year, barring changes to the groups, CMS no longer publishes the standard description of the administrative presumption's designated groups in the SNF PPS Rule but disseminates them exclusively through the SNF PPS website [here](#) (in the "Case Mix Adjustment" section).

- ***Consolidated Billing***

Under [consolidated billing](#), the SNF is financially responsible for covering all services provided to the Medicare beneficiary in a Part A stay, unless the service is specifically excluded from consolidated billing. In general, [the following services](#) are excluded from consolidated billing:

- Physician's professional services;
- Certain dialysis-related services, including covered ambulance transportation to obtain the dialysis services;
- Certain ambulance services, including ambulance services that transport the beneficiary to the SNF initially, ambulance services that transport the beneficiary from the SNF at the end of the stay (other than in situations involving transfer to another SNF), and roundtrip ambulance services furnished during the stay that transport the beneficiary offsite temporarily in order to receive dialysis, or to receive certain types of intensive or emergency outpatient hospital services;
- Erythropoietin for certain dialysis patients;
- Certain chemotherapy drugs;
- Certain chemotherapy administration services;
- Radioisotope services; and
- Customized prosthetic devices.

For Medicare beneficiaries in a non-covered stay, only therapy services are subject to consolidated billing. All other covered SNF services for these beneficiaries can be separately billed to and paid by the Medicare contractor.

CMS provides a [specific listing of excluded services](#) by Health Care Common Procedure Codes (HCPCs) that providers can use to determine if a specific service is excluded. As in previous years, CMS specifically requested and reviewed stakeholder input on excluding services that fall into the four specified categories (chemotherapy items, chemotherapy administration services, radioisotope services, and customized prosthetic devices) within which CMS has the authority to designate additional, individual services for exclusion. In the final rule, CMS discusses a number of suggestions, including many that have been addressed in prior years, but ultimately makes no changes to the consolidated billing exclusions list, noting that most of the suggestions do not meet the statutory requirement for exclusion.

The one area that CMS acknowledged merited further consideration was oral chemotherapy drugs, even though one of the exclusion criteria is that the drugs "are not usually self-administered by the patient", which seems to eliminate oral drugs as a class from exclusion eligibility. CMS pointed to interactive training on consolidated billing available [here](#) and noted that the structure of new reimbursement methodology, PDPM, may help mitigate some of the concerns regarding high cost drugs by more accurately reflecting their costs in the Non Therapy Ancillary (NTA) component.

FY 2018 Wage Index

The final wage indices for FY 2019 will impact the SNF PPS rates effective Oct. 1, 2018 and the Home Health Agency (HHA) PPS rates effective Jan. 1, 2019. These indices continue to be based on hospital wage data. CMS uses Core Based Statistical Areas (CBSAs) to determine the Medicare wage index in a geographic region.

Table 2 below lists all the counties in the state indicating whether their designation is urban or rural, provides the CBSA for each urban county and shows the corresponding FY 2019 wage index. The wage index is used as a multiplier against the labor portion of the base PPS rates to adjust for regional wage differences. For FY 2019, CMS determined that 70.5 percent of the SNF base rate is wage related so the wage index is applied to 70.5 percent of the base payment for each RUG. You may also refer to the CMS Wage Index web page by [clicking here](#).

The largest regional wage index decrease was in the Utica area (-4.6 percent) resulting in a net decrease in rates from last year. The Ithaca region index dropped by 2.6 percent, the Rochester and Buffalo area indexes decreased by roughly 2 percent, but the Dutchess/Putnam Counties index rose by 9.5 percent. The New York City index dropped by 0.2 percent while the index for rural areas increased by 0.1 percent.

CMS intends to continue using the same wage index adjustment under the PDPM methodology. In our submitted comments we urged CMS to take this opportunity, especially with the increased availability of wage data due to Payroll-Based Journal (PBJ) reporting, to develop a SNF-specific wage index since the hospital wage index fails to accurately reflect the higher use of paraprofessionals in nursing homes. In the final rule CMS indicates that the reporting and auditing effort that would be required to develop a SNF wage index is prohibitive at this point but that they would share the PBJ idea for further discussion.

Table 2. New York State FY 2019 Wage Indices by County

County Name	CBSA Name	Urban/ Rural	Wage Index
Albany County, New York	Albany-Schenectady-Troy, NY	Urban	0.8112
Allegany County, New York	Non-Urban New York State	Rural	0.8499
Bronx County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Broome County, New York	Binghamton, NY	Urban	0.8359
Cattaraugus County, New York	Non-Urban New York State	Rural	0.8499
Cayuga County, New York	Non-Urban New York State	Rural	0.8499
Chautauqua County, New York	Non-Urban New York State	Rural	0.8499
Chemung County, New York	Elmira, NY	Urban	0.8652
Chenango County, New York	Non-Urban New York State	Rural	0.8499
Clinton County, New York	Non-Urban New York State	Rural	0.8499
Columbia County, New York	Non-Urban New York State	Rural	0.8499
Cortland County, New York	Non-Urban New York State	Rural	0.8499
Delaware County, New York	Non-Urban New York State	Rural	0.8499
Dutchess County, New York	Dutchess County-Putnam County, NY	Urban	1.2263
Erie County, New York	Buffalo-Cheektowaga-Niagara Falls, NY	Urban	1.0393
Essex County, New York	Non-Urban New York State	Rural	0.8499
Franklin County, New York	Non-Urban New York State	Rural	0.8499
Fulton County, New York	Non-Urban New York State	Rural	0.8499

County Name	CBSA Name	Urban/ Rural	Wage Index
Genesee County, New York	Non-Urban New York State	Rural	0.8499
Greene County, New York	Non-Urban New York State	Rural	0.8499
Hamilton County, New York	Non-Urban New York State	Rural	0.8499
Herkimer County, New York	Utica-Rome, NY	Urban	0.8885
Jefferson County, New York	Watertown-Fort Drum, NY (Jefferson)	Urban	0.9105
Kings County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Lewis County, New York	Non-Urban New York State	Rural	0.8499
Livingston County, New York	Rochester, NY	Urban	0.8580
Madison County, New York	Syracuse, NY	Urban	1.0053
Monroe County, New York	Rochester, NY	Urban	0.8580
Montgomery County, New York	Non-Urban New York State	Rural	0.8499
Nassau County, New York	Nassau County-Suffolk County, NY	Urban	1.2876
New York County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Niagara County, New York	Buffalo-Cheektowaga-Niagara Falls, NY	Urban	1.0393
Oneida County, New York	Utica-Rome, NY	Urban	0.8885
Onondaga County, New York	Syracuse, NY	Urban	1.0053
Ontario County, New York	Rochester, NY	Urban	0.8580
Orange County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Orleans County, New York	Rochester, NY	Urban	0.8580
Oswego County, New York	Syracuse, NY	Urban	1.0053
Otsego County, New York	Non-Urban New York State	Rural	0.8499
Putnam County, New York	Dutchess County-Putnam County, NY	Urban	1.2263
Queens County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Rensselaer County, New York	Albany-Schenectady-Troy, NY	Urban	0.8112
Richmond County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Rockland County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777
Saratoga County, New York	Albany-Schenectady-Troy, NY	Urban	0.8112
Schenectady County, New York	Albany-Schenectady-Troy, NY	Urban	0.8112
Schoharie County, New York	Albany-Schenectady-Troy, NY	Urban	0.8112
Schuyler County, New York	Non-Urban New York State	Rural	0.8499
Seneca County, New York	Non-Urban New York State	Rural	0.8499
St. Lawrence County, New York	Non-Urban New York State	Rural	0.8499
Statewide County, New York	Non-Urban New York State	Rural	0.8499
Steuben County, New York	Non-Urban New York State	Rural	0.8499
Suffolk County, New York	Nassau County-Suffolk County, NY	Urban	1.2876
Sullivan County, New York	Non-Urban New York State	Rural	0.8499
Tioga County, New York	Binghamton, NY	Urban	0.8359
Tompkins County, New York	Ithaca, NY	Urban	0.9170
Ulster County, New York	Kingston, NY (Ulster)	Urban	0.8819
Warren County, New York	Glens Falls, NY	Urban	0.8521
Washington County, New York	Glens Falls, NY	Urban	0.8521
Wayne County, New York	Rochester, NY	Urban	0.8580
Westchester County, New York	New York-Jersey City-White Plains, NY-NJ	Urban	1.2777

County Name	CBSA Name	Urban/ Rural	Wage Index
Wyoming County, New York	Non-Urban New York State	Rural	0.8499
Yates County, New York	Rochester, NY	Urban	0.8580

Source - Centers for Medicare and Medicaid FY 2019 Wage Index Home Page

Listings of Medicare SNF Part A Rates for FY 2019

Having determined the CBSA for your county, you may refer to the chart in Appendix A for the Medicare Part A rates for your facility by RUG-IV group. If you would like to download the rate listing as an Excel™ file, please click [here](#).

Attached as Appendix B is a listing of the **Medicare Part A enhanced HIV/AIDS rates**, which are calculated by adding a 128 percent enhancement to the non-HIV rates. Note that with the implementation of PDPM in 2019, reimbursement for HIV/AIDS residents will be significantly reduced.

- **SNF PPS Medicare Part A Rate Components for FY 2019**

As previously noted, **70.5 percent of the FY 2019 rate is labor-related and 29.5 percent is non-labor**. The following tables (Urban Table 3 and Rural Table 4) provide the breakdown of the FY 2019 rate components used to develop the final Medicare Part A rates that are listed in Appendices A and B:

Table 3. Urban Rate Components (Source: CMS SNF PPS FY 2019 Final Rule)

URBAN	Rate Component:	Nursing case-mix	Therapy case-mix	Therapy non-case-mix	Non-case-mix component
	Per Diem Amount:	\$181.44	\$136.67	\$18.00	\$92.60

Table 4. Rural Rate Components (Source: CMS SNF PPS FY 2019 Final Rule)

RURAL	Rate Component:	Nursing case-mix	Therapy case-mix	Therapy non-case-mix	Non-case-mix component
	Per Diem Amount:	\$173.34	\$157.60	\$19.23	\$94.31

SNF Value-Based Purchasing (VBP)

The Protecting Access to Medicare Act of 2014 requires that VBP apply to SNF Part A fee-for-service payments beginning Oct. 1, 2018. The performance period for the first year is Calendar Year (CY) 2017. The VBP is funded with a 2 percent withhold from SNF Part A payments that can be fully or partially earned back based on each facility's rehospitalization rate and level of improvement. Major features of the program including measure specifications, calculation of VBP payments, timing of baseline and performance periods, and review and reporting provisions were previously established in prior years' SNF PPS final rules.

CMS adopted the SNF 30-Day All-Cause Readmission Measure (SNFRM) as the all-cause, all-condition readmission measure that will be used in the first stages of the SNF VBP Program, through at least FY 2021 based on current information. Each facility receives a SNF VBP Performance score (0 to 100) and ranking which is calculated based on that SNF's performance on the SNFRM during the performance

period and the baseline period. Each SNF's VBP performance score is equal to the higher of its achievement score or improvement score. SNFs are awarded points for achievement on a 0-100-point scale and for improvement on a 0-90-point scale, based on how their performance compares to national benchmarks and thresholds.

In the final FY 2019 rule, CMS finalized the performance standards for the FY 2021 program year, with a FY 2017 baseline period and FY 2019 as the performance period. The table below shows the final performance standards for the initial three years of the SNF VBP:

**Table 5. Final SNF VBP Program Performance Standards
SNF 30-Day All-Cause Readmission Measure (SNFRM)**

Program Year	Achievement Threshold	Benchmark	Performance Period	Baseline Period
FY 2019 (10/1/18 – 9/30/19)	0.80218	0.83721	CY 2017	CY 2015
FY 2020 (10/1/19 – 9/30/20)	0.80218	0.83721	FY 2018	FY 2016
FY 2021 (10/1/20 – 9/30/21)	0.79476	0.83212	FY 2019	FY 2017

The final FY 2019 SNF PPS rule includes various other revisions to the SNF VBP program:

- **Future performance periods:** To link performance as closely to the program year as possible, beginning with the FY 2022 program year, the performance period will be the one-year period following the performance period for the previous program year, and the baseline period will be the one-year period following the baseline period for the previous year. Under this policy, the performance period for the FY 2022 program year will be FY 2020 and the baseline period will be FY 2018.
- **CMS corrections:** CMS will institute a process in which it can make a one-time correction to the published achievement threshold and benchmark if it discovers an error in the data used to calculate the originally published values. This type of correction could only be done once per fiscal year. Any such annual corrections will be widely communicated through the CMS website, listservs and other channels to ensure SNFs are aware.
- **Insufficient baseline period data:** CMS is concerned that those SNFs that lack sufficient baseline period data, such as those that were newly opened or only open for a short time during the baseline period, or those that are granted extraordinary circumstance exceptions, are at risk of being given unreliable improvement scores and performance scores. Accordingly, CMS will not measure SNFs with fewer than 25 eligible stays during the baseline period on improvement for that program year but will instead only measure and score their achievement performance.
- **Low-volume SNFs:** CMS has concluded that the reliability of a SNF's measure rate and resulting performance score is adversely impacted if the SNF has too few eligible stays during the performance period. Accordingly, if a SNF has less than 25 eligible stays during a performance period for a Program year, it will be assigned a VBP performance score for that Program year that will result in a value-based incentive payment amount that is equal to the adjusted Federal per diem rate that it would have received for the fiscal year in the absence of the SNF VBP Program (i.e., a hold harmless).
- **Extraordinary Circumstances Exception (ECE) policy:** This policy, which aligns with a similar one in the SNF QRP, will provide relief to SNFs impacted by natural disasters or other circumstances beyond their control that affect resident care. Specifically, within 90 days after the event, SNFs will need to submit an ECE request form identifying the calendar months impacted and supporting documentation demonstrating the effects the extraordinary circumstance had on the care provided. If approved, CMS would calculate VBP improvement and achievement performance scores for the affected facility using data from only those months not impacted by

the extraordinary circumstance, and when the SNF had at least 25 eligible stays during the reduced performance period.

CMS discusses the possibility of accounting for social risk factors in the SNF VBP but concludes that more work is needed to do so (see further discussion below under the SNF QRP).

SNFs are notified of their rate adjustments based on their Value-Based Incentive Payments (VBIP) at least 60 days prior to the fiscal year involved (i.e., by Aug. 1st, or sooner). This notification is communicated in a SNF Performance Score Report that is accessed via the QIES-CASPER system. When these reports are made available, SNFs have 30 days to review and submit corrections to their SNF performance score and ranking to: SNFVBPinquiries@cms.hhs.gov. CMS will apply the 2 percent rate reduction required by the VBP program and the VBIP rate simultaneously to each SNF's Medicare payment rate, thereby establishing its net rate for the fiscal year.

For the FY 2019 SNF VBP Program Year – and incorporating the 2 percent reduction to SNF payments – CMS estimates that SNFs will receive rate adjustment percentages ranging from approximately -1.97 percent to approximately +2.33 percent, on a net basis. Further details on the SNF Performance Score Reports for FY 2019 are provided in our [Aug. 14th Intelligence Article](#).

SNF Quality Reporting Program (QRP)

The Improving Medicare Post-Acute Care Transformation Act of 2014 requires CMS to implement a QRP to collect standardized data to be able to compare quality and costs across different post-acute care settings. CMS has finalized nine assessment-based and three claims-based measures that are part of the SNF QRP. Beginning in Oct. 2017, SNFs that fail to meet data submission standards required by the QRP face a two-percentage point reduction in their annual Medicare Part A rate update. The four measures that were most recently added will impact payments beginning in FY 2020, but the data used for this calculation will come from SNF resident admissions and discharges that occur on or after Oct. 1, 2018. The 12 QRP measures, which were adopted in previous years' SNF PPS final rules and will be used in FY 2020, are identified below:

Table 6. Quality Measures Currently Adopted for the FY 2020 SNF QRP

Short Name	Measure Name & Data Source
Resident Assessment Instrument Minimum Data Set	
Pressure Ulcer	Percent of Residents or Patients With Pressure Ulcers That Are New or Worsened (Short Stay) (NQF #0678).*
Pressure Ulcer/Injury	Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury.
Application of Falls	Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay) (NQF #0674).
Application of Functional Assessment/Care Plan	Application of Percent of Long-Term Care Hospital (LTCH) Patients with an Admission and Discharge Functional Assessment and a Care Plan That Addresses Function (NQF #2631).
Change in Mobility Score	Application of IRF Functional Outcome Measure: Change in Mobility Score for Medical Rehabilitation Patients (NQF #2634).
Discharge Mobility Score	Application of IRF Functional Outcome Measure: Discharge Mobility Score for Medical Rehabilitation Patients (NQF #2636).
Change in Self-Care Score	Application of the IRF Functional Outcome Measure: Change in Self-Care Score for Medical Rehabilitation Patients (NQF #2633).
Discharge Self-Care Score	Application of IRF Functional Outcome Measure: Discharge Self-Care Score for Medical Rehabilitation Patients (NQF #2635).
DRR	Drug Regimen Review Conducted With Follow-Up for Identified Issues- Post Acute Care (PAC) Skilled Nursing Facility (SNF) Quality Reporting Program (QRP).

Claims-Based	
MSPB SNF	Medicare Spending Per Beneficiary (MSPB)—Post Acute Care (PAC) Skilled Nursing Facility (SNF) Quality Reporting Program (QRP).
DTC	Discharge to Community-Post Acute Care (PAC) Skilled Nursing Facility (SNF) Quality Reporting Program (QRP).
PPR	Potentially Preventable 30-Day Post-Discharge Readmission Measure for Skilled Nursing Facility (SNF) Quality Reporting Program (QRP).

* The measure will be replaced with the Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury measure, effective October 1, 2018.

In the SNF PPS final rule for FY 2019, CMS discusses the possibility of accounting for social risk factors (e.g., being a dual eligible, living in poverty, belonging to a racial or ethnic minority group, living with a disability, etc.) in the SNF QRP, but concludes that more work is needed to establish how to do so. CMS will continue working with the Office of the Assistant Secretary for Planning and Evaluation (ASPE) and other key stakeholders on this issue to identify policy solutions aimed at attaining health equity while minimizing unintended consequences.

The final FY 2019 SNF PPS rule includes various other revisions to the SNF QRP:

- **New cost-benefit analysis:** CMS is reviewing the SNF QRP's measures under its agency-wide [Meaningful Measures Initiative](#) and seeks to operate the SNF QRP in the least burdensome manner possible while continuing to incentivize quality improvement. CMS had established seven criteria that will be used to remove unnecessary measures from the SNF QRP. Under the final rule, an eighth factor has been added (i.e., the costs associated with a measure outweigh the benefit of its continued use in the program).
- **New measures:** In the FY 2018 SNF PPS final rule, CMS indicated that two measures would be added to satisfy the domain of accurately communicating the existence and transfer of health information and care preferences by Oct. 1, 2018 and intended to adopt them for the FY 2021 SNF QRP, with data collection beginning on or about Oct. 1, 2019. CMS now intends to push these dates back by one year: specify the measures by Oct. 1, 2019, use them in the FY 2022 SNF QRP, and collect data beginning Oct. 1, 2020.
- **Non-compliance and reconsideration:** The final rule revises the methods CMS will use to notify SNFs of non-compliance with the QRP and of their decision on any reconsideration request filed by a SNF. In both cases, CMS will provide written notification to the facility through one of the following methods: the Quality Improvement Evaluation System Assessment Submission and Processing (QIES ASAP) system; the U.S. Postal Service; or via email from the Medicare Administrative Contractor.
- **Public display of measures:** The FY 2018 SNF PPS final rule indicated that the Medicare Spending Per Beneficiary-PAC SNF and Discharge to Community-PAC SNF QRP measures would be publicly displayed in *Nursing Home Compare* in CY 2018 based on discharges in FY 2017. Under the final FY 2019 rule, CMS plans to report two years of data at a time on these measures in CY 2019, based on discharges from Oct. 1, 2016 through Sept. 30, 2018. CMS also plans to begin publicly displaying data in CY 2020 on the following four assessment-based measures: (1) Change in Self-Care Score; (2) Change in Mobility Score; (3) Discharge Self-Care Score; and (4) Discharge Mobility Score. SNFs are required to submit data on these four assessment-based measures for admissions and discharges on or after Oct. 1, 2018.

SNFs are required to submit all data necessary to calculate SNF QRP measures on at least 80 percent of the MDS assessments submitted to comply with SNF QRP requirements. SNFs that were identified as not meeting the 80 percent reporting threshold for fiscal 2019 were notified in early July 2018 of their non-compliance. While most SNFs apparently met the QRP reporting threshold, some SNFs were surprised to receive these notices as they believed they were complying.

One of the reasons for the incomplete data is the coding of a “—” (dash) in certain key items in the newer section GG of the MDS, which counts as “non-reporting” for purposes of compliance with the SNF QRP. For this measure, “resident-level reports” are available in CASPER and indicate which residents’ MDSs were not complete and triggered the non-compliance. This report may be helpful in identifying what information needs to be corrected and provided as part of the reconsideration request. The details of which MDS elements tie to which QRP measures are provided in the [SNF QRP APU Table for Assessment-Based Measures for FY2019](#).

To ensure future compliance, SNFs that provide their CMS Certification Number and email address(es) to: QRPHelp@cormac-corp.com (a CMS contractor) will receive quarterly submission deadline reminders if they are under-reporting. These emails are only sent to SNFs if they are not meeting all required reporting thresholds ahead of the submission deadline.

SNFs that did not request reconsideration or whose requests were denied will be subject to a 2 percent reduction to their FY 2019 Medicare fee-for-service rates beginning October 1, 2018. For these facilities, the net Market Basket Index (MBI) update to PPS rates for FY 2019 will be 0.4 percent (i.e., 2.4 percent MBI – 2 percent QRP penalty).

Conclusion

For questions on the SNF PPS rates, please contact Darius Kirstein by e-mail, dkirstein@leadingageny.org, or call 518-867-8841. For questions on SNF value-based purchasing or quality reporting, please contact Dan Heim at dheim@leadingageny.org or call 518-867-8866.

Appendix A - Listing of SNF PPS Rates for FFY 2019 (1 of 2)

66- RUG IV	ALBANY	BINGHAMTON	BUFFALO	DUTCHESS	ELMIRA	GLENS FALLS	ITHACA	KINGSTON
GROUP	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX
	0.8112	0.8359	1.0393	1.2263	0.8652	0.8521	0.9170	0.8819
RUX	\$721.79	\$736.28	\$855.68	\$965.45	\$753.48	\$745.79	\$783.89	\$763.29
RUL	\$706.06	\$720.25	\$837.04	\$944.42	\$737.07	\$729.55	\$766.81	\$746.66
RVX	\$642.45	\$655.36	\$761.63	\$859.33	\$670.67	\$663.82	\$697.73	\$679.39
RVL	\$576.39	\$587.97	\$683.31	\$770.97	\$601.70	\$595.56	\$625.99	\$609.53
RHX	\$582.07	\$593.76	\$690.04	\$778.56	\$607.63	\$601.43	\$632.15	\$615.54
RHL	\$519.15	\$529.58	\$615.46	\$694.41	\$541.95	\$536.42	\$563.82	\$549.00
RMX	\$533.94	\$544.67	\$632.99	\$714.19	\$557.39	\$551.70	\$579.88	\$564.64
RML	\$489.90	\$499.74	\$580.78	\$655.28	\$511.42	\$506.20	\$532.05	\$518.07
RLX	\$468.92	\$478.34	\$555.91	\$627.22	\$489.52	\$484.52	\$509.27	\$495.88
RUC	\$547.20	\$558.19	\$648.71	\$731.92	\$571.23	\$565.40	\$594.28	\$578.66
RUB	\$547.20	\$558.19	\$648.71	\$731.92	\$571.23	\$565.40	\$594.28	\$578.66
RUA	\$457.55	\$466.74	\$542.42	\$612.00	\$477.64	\$472.77	\$496.91	\$483.85
RVC	\$469.43	\$478.86	\$556.52	\$627.91	\$490.05	\$485.05	\$509.83	\$496.43
RVB	\$406.52	\$414.68	\$481.93	\$543.75	\$424.37	\$420.04	\$441.50	\$429.89
RVA	\$404.95	\$413.08	\$480.06	\$541.65	\$422.73	\$418.42	\$439.79	\$428.23
RHC	\$409.05	\$417.27	\$484.93	\$547.14	\$427.01	\$422.66	\$444.25	\$432.57
RHB	\$368.16	\$375.55	\$436.45	\$492.44	\$384.32	\$380.40	\$399.83	\$389.32
RHA	\$324.11	\$330.63	\$384.24	\$433.53	\$338.35	\$334.90	\$352.00	\$342.75
RMC	\$359.35	\$366.57	\$426.01	\$480.66	\$375.13	\$371.30	\$390.27	\$380.01
RMB	\$337.33	\$344.11	\$399.91	\$451.21	\$352.15	\$348.55	\$366.36	\$356.73
RMA	\$277.56	\$283.14	\$329.05	\$371.26	\$289.75	\$286.79	\$301.44	\$293.52
RLB	\$349.38	\$356.40	\$414.19	\$467.33	\$364.73	\$361.00	\$379.44	\$369.47
RLA	\$225.12	\$229.65	\$266.89	\$301.12	\$235.01	\$232.61	\$244.49	\$238.07
ES3	\$658.98	\$672.21	\$781.22	\$881.43	\$687.91	\$680.89	\$715.67	\$696.86
ES2	\$515.84	\$526.20	\$611.53	\$689.98	\$538.50	\$533.00	\$560.23	\$545.50
ES1	\$460.79	\$470.05	\$546.27	\$616.34	\$481.03	\$476.12	\$500.44	\$487.28
HE2	\$445.06	\$454.00	\$527.62	\$595.30	\$464.61	\$459.87	\$483.36	\$470.65
HE1	\$369.56	\$376.99	\$438.12	\$494.32	\$385.79	\$381.85	\$401.36	\$390.81
HD2	\$416.75	\$425.12	\$494.06	\$557.44	\$435.05	\$430.61	\$452.61	\$440.71
HD1	\$347.54	\$354.52	\$412.01	\$464.86	\$362.80	\$359.10	\$377.45	\$367.52
HC2	\$393.16	\$401.05	\$466.09	\$525.88	\$410.42	\$406.23	\$426.98	\$415.76
HC1	\$328.67	\$335.27	\$389.64	\$439.62	\$343.10	\$339.60	\$356.95	\$347.56
HB2	\$388.44	\$396.24	\$460.49	\$519.57	\$405.50	\$401.36	\$421.86	\$410.77
HB1	\$325.52	\$332.06	\$385.91	\$435.41	\$339.82	\$336.35	\$353.53	\$344.24
LE2	\$404.17	\$412.28	\$479.14	\$540.60	\$421.92	\$417.61	\$438.94	\$427.40
LE1	\$338.10	\$344.90	\$400.82	\$452.24	\$352.95	\$349.35	\$367.20	\$357.54
LD2	\$388.44	\$396.24	\$460.49	\$519.57	\$405.50	\$401.36	\$421.86	\$410.77
LD1	\$325.52	\$332.06	\$385.91	\$435.41	\$339.82	\$336.35	\$353.53	\$344.24
LC2	\$341.25	\$348.11	\$404.55	\$456.45	\$356.24	\$352.60	\$370.61	\$360.87
LC1	\$287.77	\$293.55	\$341.15	\$384.92	\$300.41	\$297.34	\$312.53	\$304.32
LB2	\$323.95	\$330.46	\$384.04	\$433.31	\$338.17	\$334.72	\$351.82	\$342.57
LB1	\$275.19	\$280.72	\$326.24	\$368.09	\$287.27	\$284.34	\$298.87	\$291.01
CE2	\$360.13	\$367.36	\$426.93	\$481.70	\$375.94	\$372.10	\$391.11	\$380.83
CE1	\$331.81	\$338.48	\$393.36	\$443.83	\$346.38	\$342.85	\$360.36	\$350.89
CD2	\$341.25	\$348.11	\$404.55	\$456.45	\$356.24	\$352.60	\$370.61	\$360.87
CD1	\$312.94	\$319.22	\$370.99	\$418.58	\$326.68	\$323.35	\$339.86	\$330.93
CC2	\$298.78	\$304.78	\$354.21	\$399.64	\$311.90	\$308.72	\$324.49	\$315.96
CC1	\$276.76	\$282.32	\$328.10	\$370.19	\$288.92	\$285.97	\$300.57	\$292.67
CB2	\$276.76	\$282.32	\$328.10	\$370.19	\$288.92	\$285.97	\$300.57	\$292.67
CB1	\$256.31	\$261.46	\$303.86	\$342.84	\$267.57	\$264.84	\$278.37	\$271.05
CA2	\$234.29	\$239.00	\$277.76	\$313.39	\$244.58	\$242.09	\$254.45	\$247.76
CA1	\$218.56	\$222.95	\$259.11	\$292.35	\$228.16	\$225.83	\$237.37	\$231.13
BB2	\$248.45	\$253.44	\$294.54	\$332.32	\$259.36	\$256.71	\$269.83	\$262.73
BB1	\$237.44	\$242.21	\$281.48	\$317.59	\$247.87	\$245.34	\$257.87	\$251.09
BA2	\$205.98	\$210.12	\$244.19	\$275.52	\$215.03	\$212.83	\$223.70	\$217.82
BA1	\$196.54	\$200.49	\$233.00	\$262.89	\$205.18	\$203.08	\$213.45	\$207.84
PE2	\$331.81	\$338.48	\$393.36	\$443.83	\$346.38	\$342.85	\$360.36	\$350.89
PE1	\$316.08	\$322.43	\$374.72	\$422.79	\$329.97	\$326.60	\$343.28	\$334.26
PD2	\$312.94	\$319.22	\$370.99	\$418.58	\$326.68	\$323.35	\$339.86	\$330.93
PD1	\$297.21	\$303.18	\$352.34	\$397.54	\$310.26	\$307.10	\$322.78	\$314.30
PC2	\$268.90	\$274.30	\$318.78	\$359.67	\$280.71	\$277.84	\$292.03	\$284.36
PC1	\$256.31	\$261.46	\$303.86	\$342.84	\$267.57	\$264.84	\$278.37	\$271.05
PB2	\$228.00	\$232.58	\$270.30	\$304.97	\$238.01	\$235.59	\$247.62	\$241.11
PB1	\$218.56	\$222.95	\$259.11	\$292.35	\$228.16	\$225.83	\$237.37	\$231.13
PA2	\$188.68	\$192.47	\$223.68	\$252.37	\$196.97	\$194.96	\$204.91	\$199.53
PA1	\$180.82	\$184.45	\$214.36	\$241.85	\$188.76	\$186.83	\$196.37	\$191.21

Appendix A - Listing of SNF PPS Rates for FFY 2019 (2 of 2)

	NASSAU-	NEW YORK					
66- RUG IV	SUFFOLK	METRO	ROCHESTER	SYRACUSE	UTICA	WATERTOWN	NON-URBAN
GROUP	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX
	1.2876	1.2777	0.8580	1.0053	0.8885	0.9105	0.8499
RUX	\$1,001.43	\$995.62	\$749.26	\$835.72	\$767.16	\$780.07	\$761.70
RUL	\$979.61	\$973.93	\$732.94	\$817.52	\$750.45	\$763.08	\$746.19
RVX	\$891.36	\$886.19	\$666.90	\$743.87	\$682.84	\$694.33	\$669.25
RVL	\$799.70	\$795.06	\$598.33	\$667.38	\$612.63	\$622.94	\$604.15
RHX	\$807.58	\$802.90	\$604.22	\$673.95	\$618.66	\$629.08	\$599.36
RHL	\$720.29	\$716.11	\$538.91	\$601.10	\$551.79	\$561.08	\$537.36
RMX	\$740.81	\$736.51	\$554.27	\$618.23	\$567.51	\$577.06	\$544.68
RML	\$679.71	\$675.76	\$508.55	\$567.23	\$520.70	\$529.46	\$501.28
RLX	\$650.60	\$646.82	\$486.77	\$542.94	\$498.40	\$506.79	\$474.08
RUC	\$759.20	\$754.80	\$568.03	\$633.58	\$581.60	\$591.39	\$589.65
RUB	\$759.20	\$754.80	\$568.03	\$633.58	\$581.60	\$591.39	\$589.65
RUA	\$634.81	\$631.13	\$474.96	\$529.77	\$486.31	\$494.50	\$501.30
RVC	\$651.31	\$647.53	\$487.30	\$543.54	\$498.95	\$507.34	\$498.76
RVB	\$564.02	\$560.74	\$421.99	\$470.69	\$432.07	\$439.35	\$436.76
RVA	\$561.83	\$558.57	\$420.36	\$468.87	\$430.40	\$437.65	\$435.21
RHC	\$567.53	\$564.24	\$424.62	\$473.62	\$434.77	\$442.08	\$428.86
RHB	\$510.79	\$507.83	\$382.17	\$426.27	\$391.30	\$397.89	\$388.56
RHA	\$449.69	\$447.08	\$336.45	\$375.28	\$344.49	\$350.29	\$345.16
RMC	\$498.58	\$495.68	\$373.03	\$416.08	\$381.94	\$388.37	\$372.63
RMB	\$468.02	\$465.31	\$350.17	\$390.58	\$358.54	\$364.57	\$350.93
RMA	\$385.10	\$382.86	\$288.13	\$321.37	\$295.01	\$299.98	\$292.04
RLB	\$484.74	\$481.93	\$362.68	\$404.53	\$371.35	\$377.60	\$356.28
RLA	\$312.34	\$310.53	\$233.69	\$260.66	\$239.28	\$243.30	\$233.84
ES3	\$914.28	\$908.98	\$684.06	\$763.00	\$700.40	\$712.19	\$656.41
ES2	\$715.69	\$711.54	\$535.47	\$597.27	\$548.27	\$557.50	\$515.37
ES1	\$639.31	\$635.61	\$478.33	\$533.53	\$489.76	\$498.00	\$461.12
HE2	\$617.49	\$613.91	\$462.00	\$515.32	\$473.04	\$481.00	\$445.62
HE1	\$512.74	\$509.77	\$383.63	\$427.90	\$392.79	\$399.41	\$371.22
HD2	\$578.21	\$574.86	\$432.61	\$482.53	\$442.95	\$450.40	\$417.72
HD1	\$482.19	\$479.39	\$360.77	\$402.40	\$369.39	\$375.61	\$349.52
HC2	\$545.48	\$542.31	\$408.12	\$455.22	\$417.87	\$424.91	\$394.47
HC1	\$456.00	\$453.36	\$341.18	\$380.55	\$349.33	\$355.21	\$330.92
HB2	\$538.93	\$535.80	\$403.22	\$449.75	\$412.86	\$419.81	\$389.82
HB1	\$451.64	\$449.02	\$337.91	\$376.91	\$345.99	\$351.81	\$327.82
LE2	\$560.75	\$557.50	\$419.55	\$467.96	\$429.57	\$436.80	\$405.32
LE1	\$469.10	\$466.37	\$350.97	\$391.47	\$359.36	\$365.41	\$340.22
LD2	\$538.93	\$535.80	\$403.22	\$449.75	\$412.86	\$419.81	\$389.82
LD1	\$451.64	\$449.02	\$337.91	\$376.91	\$345.99	\$351.81	\$327.82
LC2	\$473.46	\$470.71	\$354.24	\$395.12	\$362.70	\$368.81	\$343.32
LC1	\$399.26	\$396.95	\$298.72	\$333.20	\$305.86	\$311.01	\$290.62
LB2	\$449.46	\$446.85	\$336.28	\$375.08	\$344.31	\$350.11	\$326.27
LB1	\$381.81	\$379.59	\$285.66	\$318.63	\$292.49	\$297.41	\$278.22
CE2	\$499.65	\$496.75	\$373.83	\$416.97	\$382.76	\$389.21	\$361.92
CE1	\$460.37	\$457.70	\$344.44	\$384.19	\$352.67	\$358.61	\$334.02
CD2	\$473.46	\$470.71	\$354.24	\$395.12	\$362.70	\$368.81	\$343.32
CD1	\$434.18	\$431.66	\$324.85	\$362.34	\$332.61	\$338.21	\$315.42
CC2	\$414.54	\$412.13	\$310.15	\$345.95	\$317.56	\$322.91	\$301.47
CC1	\$383.99	\$381.76	\$287.30	\$320.45	\$294.16	\$299.11	\$279.77
CB2	\$383.99	\$381.76	\$287.30	\$320.45	\$294.16	\$299.11	\$279.77
CB1	\$355.62	\$353.55	\$266.07	\$296.77	\$272.43	\$277.01	\$259.62
CA2	\$325.07	\$323.18	\$243.21	\$271.28	\$249.02	\$253.21	\$237.92
CA1	\$303.24	\$301.48	\$226.88	\$253.07	\$232.30	\$236.21	\$222.42
BB2	\$344.71	\$342.71	\$257.91	\$287.67	\$264.07	\$268.51	\$251.87
BB1	\$329.43	\$327.52	\$246.48	\$274.92	\$252.37	\$256.61	\$241.02
BA2	\$285.78	\$284.13	\$213.82	\$238.50	\$218.93	\$222.62	\$210.02
BA1	\$272.69	\$271.11	\$204.02	\$227.57	\$208.90	\$212.42	\$200.72
PE2	\$460.37	\$457.70	\$344.44	\$384.19	\$352.67	\$358.61	\$334.02
PE1	\$438.54	\$436.00	\$328.11	\$365.98	\$335.95	\$341.61	\$318.52
PD2	\$434.18	\$431.66	\$324.85	\$362.34	\$332.61	\$338.21	\$315.42
PD1	\$412.36	\$409.96	\$308.52	\$344.12	\$315.89	\$321.21	\$299.92
PC2	\$373.08	\$370.91	\$279.13	\$311.34	\$285.80	\$290.61	\$272.02
PC1	\$355.62	\$353.55	\$266.07	\$296.77	\$272.43	\$277.01	\$259.62
PB2	\$316.34	\$314.50	\$236.68	\$263.99	\$242.34	\$246.41	\$231.72
PB1	\$303.24	\$301.48	\$226.88	\$253.07	\$232.30	\$236.21	\$222.42
PA2	\$261.78	\$260.26	\$195.86	\$218.46	\$200.54	\$203.92	\$192.97
PA1	\$250.87	\$249.41	\$187.70	\$209.36	\$192.18	\$195.42	\$185.22

Appendix B - Listing of SNF PPS Rates for FFY 2019 AIDS RATES (1 of 2)

66- RUG IV	ALBANY	BINGHAMTON	BUFFALO	DUTCHESS	ELMIRA	GLENS FALLS	ITHACA	KINGSTON
	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX
GROUP	0.8112	0.8359	1.0393	1.2263	0.8652	0.8521	0.9170	0.8819
RUX	\$1,613.01	\$1,678.73	\$1,950.95	\$2,201.22	\$1,717.94	\$1,700.41	\$1,787.27	\$1,740.29
RUL	\$1,577.88	\$1,642.16	\$1,908.45	\$2,153.27	\$1,680.52	\$1,663.37	\$1,748.34	\$1,702.39
RVX	\$1,435.74	\$1,494.22	\$1,736.51	\$1,959.28	\$1,529.12	\$1,513.51	\$1,590.83	\$1,549.01
RVL	\$1,288.11	\$1,340.57	\$1,557.95	\$1,757.81	\$1,371.88	\$1,357.88	\$1,427.25	\$1,389.73
RHX	\$1,300.77	\$1,353.78	\$1,573.30	\$1,775.13	\$1,385.40	\$1,371.26	\$1,441.31	\$1,403.42
RHL	\$1,160.18	\$1,207.45	\$1,403.24	\$1,583.25	\$1,235.65	\$1,223.04	\$1,285.52	\$1,251.73
RMX	\$1,193.24	\$1,241.84	\$1,443.22	\$1,628.36	\$1,270.85	\$1,257.88	\$1,322.14	\$1,287.39
RML	\$1,094.82	\$1,139.41	\$1,324.18	\$1,494.04	\$1,166.03	\$1,154.13	\$1,213.08	\$1,181.20
RLX	\$1,047.94	\$1,090.62	\$1,267.47	\$1,430.07	\$1,116.10	\$1,104.71	\$1,161.14	\$1,130.62
RUC	\$1,222.86	\$1,272.68	\$1,479.05	\$1,668.79	\$1,302.41	\$1,289.12	\$1,354.97	\$1,319.35
RUB	\$1,222.86	\$1,272.68	\$1,479.05	\$1,668.79	\$1,302.41	\$1,289.12	\$1,354.97	\$1,319.35
RUA	\$1,022.51	\$1,064.16	\$1,236.72	\$1,395.37	\$1,089.02	\$1,077.90	\$1,132.96	\$1,103.19
RVC	\$1,049.08	\$1,091.81	\$1,268.86	\$1,431.62	\$1,117.31	\$1,105.91	\$1,162.40	\$1,131.85
RVB	\$908.48	\$945.48	\$1,098.80	\$1,239.75	\$967.57	\$957.69	\$1,006.61	\$980.15
RVA	\$904.97	\$941.82	\$1,094.55	\$1,234.95	\$963.82	\$953.99	\$1,002.72	\$976.36
RHC	\$914.13	\$951.37	\$1,105.64	\$1,247.48	\$973.59	\$963.66	\$1,012.88	\$986.26
RHB	\$822.74	\$856.26	\$995.11	\$1,122.76	\$876.26	\$867.32	\$911.62	\$887.66
RHA	\$724.32	\$753.83	\$876.06	\$988.45	\$771.43	\$763.56	\$802.57	\$781.47
RMC	\$803.07	\$835.78	\$971.31	\$1,095.91	\$855.30	\$846.57	\$889.82	\$866.43
RMB	\$753.87	\$784.56	\$911.79	\$1,028.75	\$802.89	\$794.70	\$835.29	\$813.34
RMA	\$620.30	\$645.55	\$750.23	\$846.47	\$660.63	\$653.89	\$687.29	\$669.23
RLB	\$780.82	\$812.59	\$944.36	\$1,065.51	\$831.58	\$823.09	\$865.13	\$842.39
RLA	\$503.10	\$523.59	\$608.50	\$686.56	\$535.82	\$530.36	\$557.45	\$542.80
ES3	\$1,472.66	\$1,532.64	\$1,781.17	\$2,009.66	\$1,568.45	\$1,552.44	\$1,631.74	\$1,588.85
ES2	\$1,152.78	\$1,199.74	\$1,394.29	\$1,573.15	\$1,227.77	\$1,215.24	\$1,277.31	\$1,243.74
ES1	\$1,029.76	\$1,071.71	\$1,245.49	\$1,405.26	\$1,096.74	\$1,085.55	\$1,141.00	\$1,111.01
HE2	\$994.62	\$1,035.12	\$1,202.98	\$1,357.30	\$1,059.30	\$1,048.49	\$1,102.05	\$1,073.08
HE1	\$825.89	\$859.53	\$998.91	\$1,127.05	\$879.61	\$870.63	\$915.10	\$891.05
HD2	\$931.34	\$969.28	\$1,126.45	\$1,270.95	\$991.92	\$981.79	\$1,031.94	\$1,004.82
HD1	\$776.69	\$808.31	\$939.39	\$1,059.89	\$827.19	\$818.75	\$860.57	\$837.96
HC2	\$878.62	\$914.40	\$1,062.68	\$1,199.00	\$935.76	\$926.21	\$973.52	\$947.94
HC1	\$734.50	\$764.41	\$888.37	\$1,002.33	\$782.27	\$774.29	\$813.84	\$792.45
HB2	\$868.07	\$903.43	\$1,049.92	\$1,184.61	\$924.53	\$915.10	\$961.84	\$936.56
HB1	\$727.47	\$757.10	\$879.87	\$992.74	\$774.78	\$766.88	\$806.05	\$784.86
LE2	\$903.23	\$940.01	\$1,092.44	\$1,232.58	\$961.97	\$952.15	\$1,000.79	\$974.48
LE1	\$755.59	\$786.36	\$913.88	\$1,031.11	\$804.73	\$796.52	\$837.21	\$815.20
LD2	\$868.07	\$903.43	\$1,049.92	\$1,184.61	\$924.53	\$915.10	\$961.84	\$936.56
LD1	\$727.47	\$757.10	\$879.87	\$992.74	\$774.78	\$766.88	\$806.05	\$784.86
LC2	\$762.63	\$793.68	\$922.38	\$1,040.70	\$812.22	\$803.93	\$845.00	\$822.79
LC1	\$643.12	\$669.30	\$777.83	\$877.61	\$684.93	\$677.94	\$712.57	\$693.84
LB2	\$723.97	\$753.44	\$875.61	\$987.94	\$771.04	\$763.17	\$802.15	\$781.07
LB1	\$615.00	\$640.03	\$743.82	\$839.24	\$654.98	\$648.30	\$681.42	\$663.51
CE2	\$804.81	\$837.58	\$973.40	\$1,098.27	\$857.14	\$848.40	\$891.73	\$868.30
CE1	\$741.53	\$771.73	\$896.87	\$1,011.92	\$789.76	\$781.70	\$821.63	\$800.03
CD2	\$762.63	\$793.68	\$922.38	\$1,040.70	\$812.22	\$803.93	\$845.00	\$822.79
CD1	\$699.36	\$727.83	\$845.85	\$954.36	\$744.83	\$737.23	\$774.89	\$754.52
CC2	\$667.73	\$694.91	\$807.59	\$911.19	\$711.14	\$703.88	\$739.84	\$720.39
CC1	\$618.51	\$643.69	\$748.07	\$844.03	\$658.73	\$652.01	\$685.31	\$667.30
CB2	\$618.51	\$643.69	\$748.07	\$844.03	\$658.73	\$652.01	\$685.31	\$667.30
CB1	\$572.82	\$596.14	\$692.80	\$781.68	\$610.06	\$603.83	\$634.68	\$618.00
CA2	\$523.60	\$544.92	\$633.28	\$714.52	\$557.65	\$551.96	\$580.15	\$564.90
CA1	\$488.45	\$508.34	\$590.77	\$666.55	\$520.21	\$514.90	\$541.20	\$526.98
BB2	\$555.23	\$577.84	\$671.55	\$757.69	\$591.34	\$585.31	\$615.20	\$599.03
BB1	\$530.63	\$552.24	\$641.79	\$724.11	\$565.14	\$559.37	\$587.94	\$572.49
BA2	\$460.33	\$479.07	\$556.76	\$628.18	\$490.26	\$485.26	\$510.05	\$496.64
BA1	\$439.25	\$457.12	\$531.25	\$599.40	\$467.80	\$463.03	\$486.68	\$473.89
PE2	\$741.53	\$771.73	\$896.87	\$1,011.92	\$789.76	\$781.70	\$821.63	\$800.03
PE1	\$706.38	\$735.15	\$854.36	\$963.96	\$752.32	\$744.64	\$782.68	\$762.11
PD2	\$699.36	\$727.83	\$845.85	\$954.36	\$744.83	\$737.23	\$774.89	\$754.52
PD1	\$664.20	\$691.25	\$803.34	\$906.39	\$707.40	\$700.18	\$735.94	\$716.60
PC2	\$600.94	\$625.40	\$726.81	\$820.05	\$640.01	\$633.48	\$665.84	\$648.34
PC1	\$572.82	\$596.14	\$692.80	\$781.68	\$610.06	\$603.83	\$634.68	\$618.00
PB2	\$509.55	\$530.29	\$616.28	\$695.33	\$542.67	\$537.14	\$564.57	\$549.73
PB1	\$488.45	\$508.34	\$590.77	\$666.55	\$520.21	\$514.90	\$541.20	\$526.98
PA2	\$421.66	\$438.83	\$509.99	\$575.41	\$449.08	\$444.50	\$467.20	\$454.92
PA1	\$404.09	\$420.54	\$488.73	\$551.43	\$430.36	\$425.97	\$447.73	\$435.96

Appendix B - Listing of SNF PPS Rates for FFY 2019 AIDS RATES (2 of 2)

	NASSAU-	NEW YORK					
66- RUG IV	SUFFOLK	METRO	ROCHESTER	SYRACUSE	UTICA	WATERTOWN	NON-URBAN*
	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX	WAGE INDEX
	1.2876	1.2777	0.8580	1.0053	0.8885	0.9105	0.8499
RUX	\$2,283.26	\$2,270.01	\$1,708.31	\$1,905.44	\$1,749.13	\$1,778.57	\$1,736.67
RUL	\$2,233.52	\$2,220.56	\$1,671.10	\$1,863.94	\$1,711.03	\$1,739.83	\$1,701.32
RVX	\$2,032.30	\$2,020.51	\$1,520.54	\$1,696.01	\$1,556.88	\$1,583.08	\$1,525.90
RVL	\$1,823.32	\$1,812.74	\$1,364.19	\$1,521.62	\$1,396.79	\$1,420.30	\$1,377.47
RHX	\$1,841.29	\$1,830.60	\$1,377.63	\$1,536.61	\$1,410.55	\$1,434.29	\$1,366.53
RHL	\$1,642.26	\$1,632.73	\$1,228.72	\$1,370.52	\$1,258.08	\$1,279.26	\$1,225.18
RMX	\$1,689.04	\$1,679.24	\$1,263.72	\$1,409.56	\$1,293.92	\$1,315.70	\$1,241.87
RML	\$1,549.73	\$1,540.73	\$1,159.49	\$1,293.29	\$1,187.19	\$1,207.18	\$1,142.92
RLX	\$1,483.36	\$1,474.76	\$1,109.84	\$1,237.91	\$1,136.36	\$1,155.48	\$1,080.91
RUC	\$1,730.99	\$1,720.94	\$1,295.10	\$1,444.56	\$1,326.05	\$1,348.37	\$1,344.40
RUB	\$1,730.99	\$1,720.94	\$1,295.10	\$1,444.56	\$1,326.05	\$1,348.37	\$1,344.40
RUA	\$1,447.38	\$1,438.98	\$1,082.91	\$1,207.88	\$1,108.79	\$1,127.45	\$1,142.97
RVC	\$1,484.98	\$1,476.36	\$1,111.05	\$1,239.26	\$1,137.59	\$1,156.74	\$1,137.17
RVB	\$1,285.96	\$1,278.50	\$962.14	\$1,073.17	\$985.13	\$1,001.71	\$995.81
RVA	\$1,280.98	\$1,273.55	\$958.42	\$1,069.02	\$981.32	\$997.84	\$992.27
RHC	\$1,293.97	\$1,286.46	\$968.13	\$1,079.85	\$991.27	\$1,007.95	\$977.80
RHB	\$1,164.60	\$1,157.85	\$871.34	\$971.90	\$892.16	\$907.18	\$885.92
RHA	\$1,025.29	\$1,019.34	\$767.11	\$855.63	\$785.44	\$798.66	\$786.97
RMC	\$1,136.75	\$1,130.16	\$850.51	\$948.65	\$870.83	\$885.49	\$849.60
RMB	\$1,067.09	\$1,060.90	\$798.39	\$890.52	\$817.46	\$831.23	\$800.13
RMA	\$878.02	\$872.93	\$656.93	\$732.73	\$672.62	\$683.94	\$665.84
RLB	\$1,105.22	\$1,098.80	\$826.91	\$922.34	\$846.67	\$860.92	\$812.33
RLA	\$712.14	\$708.01	\$532.82	\$594.31	\$545.55	\$554.73	\$533.15
ES3	\$2,084.56	\$2,072.47	\$1,559.65	\$1,739.63	\$1,596.91	\$1,623.80	\$1,496.63
ES2	\$1,631.78	\$1,622.32	\$1,220.88	\$1,361.77	\$1,250.06	\$1,271.10	\$1,175.04
ES1	\$1,457.64	\$1,449.18	\$1,090.59	\$1,216.44	\$1,116.65	\$1,135.44	\$1,051.35
HE2	\$1,407.88	\$1,399.71	\$1,053.36	\$1,174.92	\$1,078.53	\$1,096.69	\$1,016.01
HE1	\$1,169.05	\$1,162.27	\$874.67	\$975.61	\$895.57	\$910.65	\$846.38
HD2	\$1,318.32	\$1,310.67	\$986.35	\$1,100.18	\$1,009.92	\$1,026.92	\$952.40
HD1	\$1,099.39	\$1,093.01	\$822.55	\$917.48	\$842.21	\$856.39	\$796.91
HC2	\$1,243.69	\$1,236.47	\$930.51	\$1,037.89	\$952.75	\$968.78	\$899.39
HC1	\$1,039.69	\$1,033.65	\$777.88	\$867.65	\$796.47	\$809.88	\$754.50
HB2	\$1,228.76	\$1,221.63	\$919.34	\$1,025.44	\$941.31	\$957.16	\$888.79
HB1	\$1,029.74	\$1,023.76	\$770.44	\$859.34	\$788.85	\$802.12	\$747.43
LE2	\$1,278.52	\$1,271.10	\$956.57	\$1,066.96	\$979.43	\$995.92	\$924.13
LE1	\$1,069.54	\$1,063.33	\$800.22	\$892.56	\$819.34	\$833.13	\$775.70
LD2	\$1,228.76	\$1,221.63	\$919.34	\$1,025.44	\$941.31	\$957.16	\$888.79
LD1	\$1,029.74	\$1,023.76	\$770.44	\$859.34	\$788.85	\$802.12	\$747.43
LC2	\$1,079.49	\$1,073.23	\$807.66	\$900.87	\$826.96	\$840.88	\$782.77
LC1	\$910.32	\$905.04	\$681.09	\$759.69	\$697.37	\$709.11	\$662.62
LB2	\$1,024.76	\$1,018.81	\$766.71	\$855.19	\$785.03	\$798.25	\$743.90
LB1	\$870.52	\$865.46	\$651.31	\$726.47	\$666.87	\$678.10	\$634.35
CE2	\$1,139.20	\$1,132.59	\$852.34	\$950.69	\$872.70	\$887.39	\$825.18
CE1	\$1,049.64	\$1,043.55	\$785.33	\$875.95	\$804.09	\$817.63	\$761.57
CD2	\$1,079.49	\$1,073.23	\$807.66	\$900.87	\$826.96	\$840.88	\$782.77
CD1	\$989.93	\$984.19	\$740.66	\$826.13	\$758.35	\$771.12	\$719.16
CC2	\$945.15	\$939.67	\$707.15	\$788.76	\$724.05	\$736.24	\$687.35
CC1	\$875.49	\$870.41	\$655.03	\$730.62	\$670.68	\$681.97	\$637.88
CB2	\$875.49	\$870.41	\$655.03	\$730.62	\$670.68	\$681.97	\$637.88
CB1	\$810.81	\$806.10	\$606.64	\$676.64	\$621.13	\$631.59	\$591.94
CA2	\$741.15	\$736.85	\$554.52	\$618.51	\$567.77	\$577.33	\$542.46
CA1	\$691.39	\$687.38	\$517.29	\$576.99	\$529.65	\$538.57	\$507.12
BB2	\$785.93	\$781.37	\$588.02	\$655.88	\$602.08	\$612.21	\$574.27
BB1	\$751.10	\$746.74	\$561.97	\$626.82	\$575.39	\$585.08	\$549.53
BA2	\$651.59	\$647.81	\$487.51	\$543.77	\$499.16	\$507.56	\$478.85
BA1	\$621.74	\$618.13	\$465.18	\$518.86	\$476.29	\$484.31	\$457.65
PE2	\$1,049.64	\$1,043.55	\$785.33	\$875.95	\$804.09	\$817.63	\$761.57
PE1	\$999.88	\$994.08	\$748.10	\$834.43	\$765.98	\$778.87	\$726.23
PD2	\$989.93	\$984.19	\$740.66	\$826.13	\$758.35	\$771.12	\$719.16
PD1	\$940.17	\$934.72	\$703.43	\$784.60	\$720.24	\$732.36	\$683.82
PC2	\$850.61	\$845.68	\$636.42	\$709.86	\$651.63	\$662.60	\$620.21
PC1	\$810.81	\$806.10	\$606.64	\$676.64	\$621.13	\$631.59	\$591.94
PB2	\$721.25	\$717.06	\$539.63	\$601.90	\$552.52	\$561.82	\$528.33
PB1	\$691.39	\$687.38	\$517.29	\$576.99	\$529.65	\$538.57	\$507.12
PA2	\$596.86	\$593.39	\$446.56	\$498.10	\$457.23	\$464.93	\$439.98
PA1	\$571.98	\$568.66	\$427.95	\$477.33	\$438.17	\$445.55	\$422.31