

Opportunity to Avoid “Quality Pool Penalty”

As nursing home members should be aware, the 2012 phase-in of quality payments consists of a rate cut for homes that fail to submit required data. This “pay for reporting” (actually a “penalize for failing to report”) approach is meant to ensure that sufficient baseline data is available to develop a quality payment mechanism for future years. DOH is now providing some flexibility to the reporting deadlines originally announced. As long as a home meets all of the 2011 cost report submission requirements (i.e., complete report, appropriately certified by CPA and operator, hard copies of related company financials) AND has [submitted immunization data and selected an immunization data reporter](#) by Oct. 15, the home will not face the penalty for failing to report on time. Please note that homes that receive an immediate jeopardy level deficiency in calendar years 2011 or 2012 are subject to the penalty even if their reports were filed perfectly. Additionally, homes that filed late cost reports may be subject to the regulatory penalty of two percent of the rate during the time period that the report was late.

Late last week we received a listing from DOH of the homes they believe did not file complete cost report materials by Aug. 29 or immunization reports by May 1. We have contacted all of the members on the list to ensure they are aware of the opportunity if they have not yet submitted their data. We are finding that most members did submit either on time or shortly after the established deadlines. If your home has not submitted all of the materials, please do so by Oct. 15 to avoid the penalty which is estimated at roughly \$1.70 for each 2012 Medicaid day.

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