

## **Inpatient Rehabilitation Facility-Patient Assessment Instrument (IRF-PAI) Non-Substantive Change Request Justification**

The Centers for Medicare & Medicaid Services (CMS) is requesting a non-substantive change request in response to the delay in the implementation of the Inpatient Rehabilitation Facility-Patient Assessment Instrument (IRF-PAI) Version 4.0. This delay is a result of the COVID-19 Public Health Emergency (PHE). In response to the PHE, CMS provided relief to the providers by delaying the implementation of IRF PAI V4.0.

Per CMS-5531-IFC (85 FR 27550) published on May 8, 2020, CMS will require IRFs to start using IRF-PAI V4.0 on October 1 of the year that is at least 1 full fiscal year after the end of the COVID-19 PHE. For example, if the COVID-19 PHE ends on October 20, 2020, IRFs will be required to begin collecting data using the updated versions of the item sets beginning with patients discharged on October 1, 2022. Until such time, IRF-PAI V3.0 will stay in effect.

CMS informed the provider community about the delay on June 17, 2020. A reference to the announcement can be found on the IRF QRP webpage found here

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-PAI-and-IRF-PAI-Manual>

CMS is asking for approval for the previously approved IRF-PAI V3.0 which the providers are currently using. The IRF-PAI is used 1) to administer the payment rate methodology under the IRF PPS described in 42 CFR 412 Subpart P, and 2) to permit the Secretary of Health and Human Services, and CMS, to collect quality measure data.