



SNF 3-Day WAIVER Frequently Asked Questions (FAQ)

For SNFs

- 1. How does a SNF know if its facility is eligible for the 3-day waiver for BIDCO Pioneer patients?**
To be eligible for the 3-day waiver, a SNF had to be included in BIDCO's application to CMS and meet a number of eligibility requirements, including earning at least a three star rating on Nursing Home Compare. BIDCO notified all of its eligible SNF participants via written communication. If you are unsure if your facility is eligible, please see the list of participant providers on our website [here](#). SNFs can partner with multiple Pioneer ACOs, as long as each Pioneer ACO listed the facility on its application to CMS.
- 2. How does a SNF know if a BIDCO Pioneer patient is eligible for the 3-day waiver?**
BIDCO will notify the SNF about eligible patients who have been approved for the waiver prior to admission to the SNF.
- 3. Will a SNF be reimbursed at a different rate for Pioneer patients admitted through the 3-day waiver?**
No. SNFs will be reimbursed for patients admitted using the 3-day waiver under the same Medicare payment rules in place for all Medicare patients. The Medicare claims processing system will identify eligible SNFs participating in the waiver program, and reimburse those SNFs without the required, prior three-day hospital admission.
- 4. How do SNFs bill for patients admitted using the 3-day waiver?**
The current billing process is unchanged. See response to question 3.
- 5. Will Critical Access Hospitals that are certified to provide the Medicare SNF benefit be considered an eligible SNF applicant under the waiver?**
Critical Access Hospitals (CAHs) that bill for SNF services using 18x and 21x bill types, and meet all other waiver requirements, are eligible to participate in the waiver program. Again, only CAHs included in BIDCO's application and approved by CMS are eligible to participate, please see list of participant providers [here](#).
- 6. Are swing beds included in the 3-day waiver?**
Yes, as long as the swing beds are in a facility included in BIDCO's 3-day waiver application.
- 7. Only SNFs with a three star overall rating on Nursing Home Compare are eligible for the waiver. What happens if an approved SNF loses its three star rating?**
CMS will review star ratings annually. Each calendar year, BIDCO will update its list of participating SNFs, and CMS will review the list to confirm each SNF's star-rating. Once CMS approves a SNF to participate in the waiver program, SNF remains eligible for the duration of the year. If a SNF star rating drops below three stars, and remains below three stars, it will be excluded from the waiver program the following year.

8. Has CMS coordinated the billing logistics to ensure patients are invoiced correctly? How will BIDCO determine patient eligibility?

CMS is committed to ensuring that beneficiaries are correctly invoiced. BIDCO and our participating providers determine patient eligibility. BIDCO will insure all SNF providers review their list of current ACO patients on a weekly basis, at minimum. CMS will also monitor the program to ensure patients are appropriately admitted to SNFs using the 3-day waiver.

For Providers

9. How do BIDCO providers identify patients who are eligible to participate in the waiver program?

BIDCO Pioneer Medicare beneficiaries are *generally* eligible for admission to eligible and CMS-approved SNFs. However, BIDCO has established additional clinical requirements for beneficiary participation in partnership with CMS, and has hired a Skilled Nursing Facility Care Manager to work with our providers to ensure clinical requirements are met for each patient. If you identify a patient who would benefit from a direct admission to an approved SNF, please contact Maureen Watchmaker RN, Skilled Nursing Facility Care Manager, at 617-754-1054 or email: mwatchma@bidmc.harvard.edu.

10. Can a provider outside of BIDCO admit a patient to an approved SNF?

No. Only providers who are an active BIDCO ACO provider can admit a patient to a SNF using the 3-day waiver. While a referral to admit a patient to the SNF under the waiver program can be made by any provider, even one not affiliated with BIDCO, the decision to admit the patient to the SNF under the waiver must be made by a BIDCO ACO provider.

11. What if an ACO patient wants to be admitted to a SNF that is not approved to participate in the 3-day waiver program?

BIDCO Pioneer ACO beneficiaries maintain the ability to select any SNF they choose. If that SNF is not participating in the waiver; the beneficiaries must abide by current Medicare regulations and will need to be admitted to the hospital, if medically necessary, for the three-day stay prior to SNF admission, or be willing to pay privately for the SNF stay.

12. What happens if an ACO patient is admitted to another ACO's approved SNF? Using the 3-day waiver, BIDCO beneficiaries must be admitted to a SNF that was included in BIDCO's application and approved by CMS. While a SNF can participate in multiple Pioneer SNF waivers, the SNF will only be reimbursed for BIDCO beneficiaries admitted to SNFs approved by CMS for BIDCO.

13. Can a patient be admitted to a SNF direct from an observation stay?

Yes, that would be considered a direct admission to the SNF since there was no preceding three-day hospital stay. The BIDCO ACO provider must approve the admission.