

FREE WEBINAR

# Building Blocks of Texas PDPM

*Crafting Your Clinical Foundation for Success*

TUE, JUN 17 | 1 PM CT



SKILLED NURSING

**simple.**  
a Netsmart solution

 CAREABILITY

 Texas  
Medicaid  
Coalition

# Your Experts



**Robert Douglas**

*VP, Revenue Integrity*

Cross Healthcare  
Management



**Lori Nabors**

*Director of Revenue Integrity  
& MDS Reimbursement*

Four Cooks Senior Care



**Albert Hoak**

*President/CEO*

Aussie<sup>2</sup> Squared  
Consulting



**Ethan Tayne**

*Quality Improvement  
Consultant*

# Attendee poll

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**Under the new Texas PDPM LTC model, which clinical program is likely to have the greatest impact – both clinically and financially – for most facilities?**

- Implementing a Respiratory Therapy Program
- Starting an IV Therapy Program
- Focusing on coding medical conditions as NTAs
- Obtaining accurate assessments on cognitive status

# Texas Medicaid Coalition (TMC)

## Introduction

- Established in 2013, Texas Medicaid Coalition (TMC) unites providers, stakeholders, and policymakers to navigate Medicaid regulations and advocate for sustainable solutions.

## Advocacy

- Engage with state agencies to influence policy, ensure provider stability, and promote fair implementation, oversight, and review of payment processes.

## Mission Statement

- To advocate for sustainable Medicaid reimbursement, collaborate with experts and state agencies to enhance regulatory understanding, and partner with professional organizations and other entities to strengthen advocacy, find solutions, and improve outcomes.

## Membership

- Free to join, TMC will be offering quarterly calls for updates. Registration link will be provided in the chat section of this call.

# Part 1 Recap

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## Understanding the Texas Medicaid PDPM LTC Structure

PDPM structure and payment components

Resident traits drive payment classification

Rationale for Texas and CMS moving to PDPM model

Importance of a standardized respiratory therapy program

TMC-certified RT training produced by Carebility

# Learning Objectives – Clinical Framework

## Describe

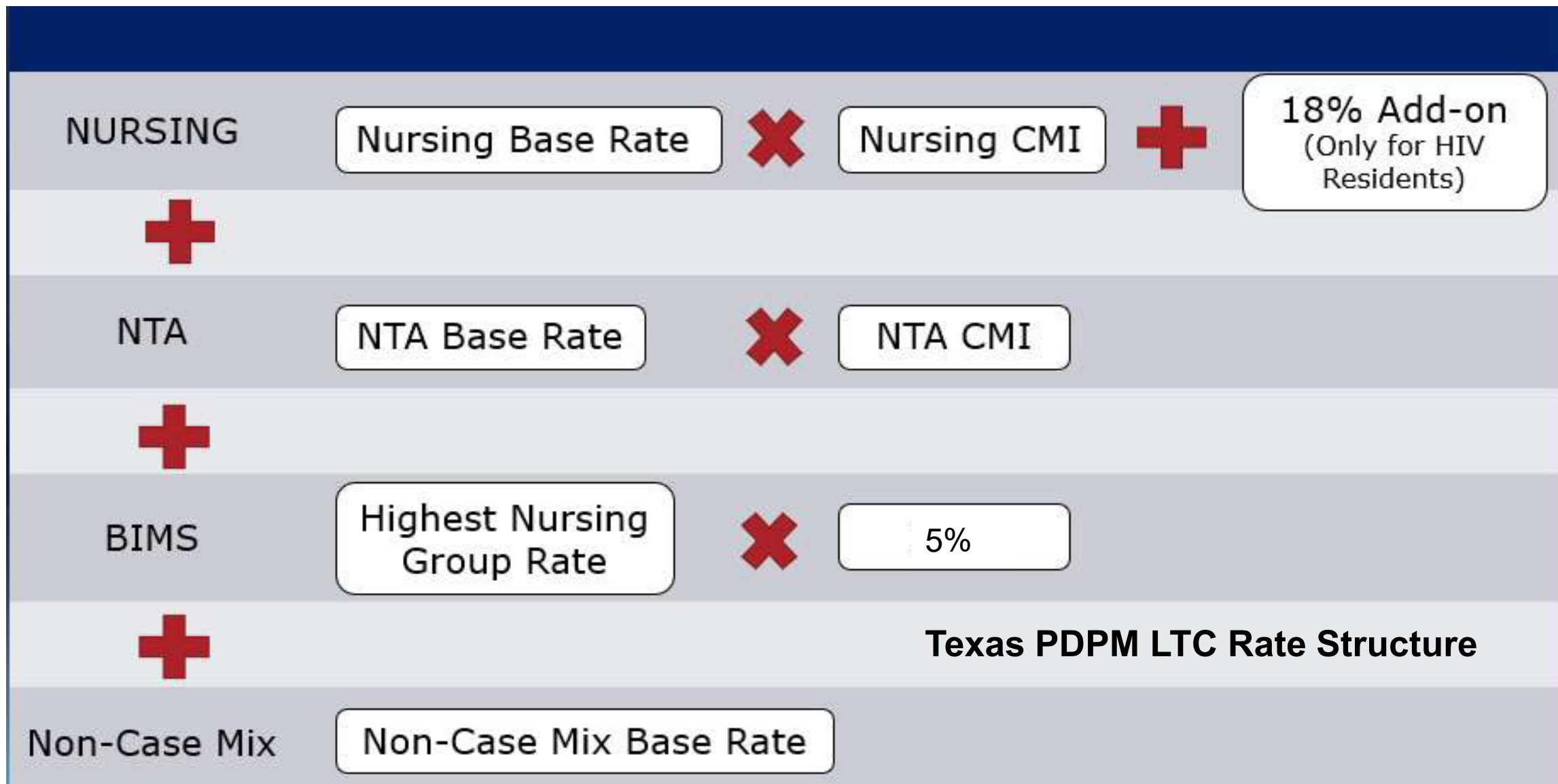
Key Concepts of  
PDPM LTC  
Clinical Framing

## Outline

Preparation for  
PDPM LTC  
Transition

## Determine

Components  
Texas PDPM LTC





# Clinical Framing

- Texas PDPM LTC is framed using a Clinical Model that removes the PT, OT, and SLP components from the rates
- Texas will use the Medicare PDPM Nursing Grouper and NTA – Non-Therapy Ancillaries along with a BIMS and an HIV Add On
- Clinically framing facility of programs and practices to capture interventions and documentation of each resident's clinical profile is essential for supporting PDPM outcomes in long-term care



Clinical Frames

**Isolation**  
Active  
Infection  
Single Room

**IV Hydration**  
Hypodermoclysis  
Parental

**Respiratory Therapy**  
Interventions  
HHN  
Incentive Spirometry

**Infections**  
IV ABT

**COPD**  
SOB while lying flat  
Respiratory  
Assessment

# Tap Into Your Hidden NTA Potential

There are 50 conditions and extensive services used to calculate into the NTA. The CMS NTA Mapping Tool has 2,148 Diagnosis Codes of Selection. NTA Captures interventions and clinical conditions to earn points.

These conditions and services are pulled from:

- **ICD-10 diagnosis codes** (Section I – I8000 )
- **Service-related items** (like IV medications, Isolation , etc.)

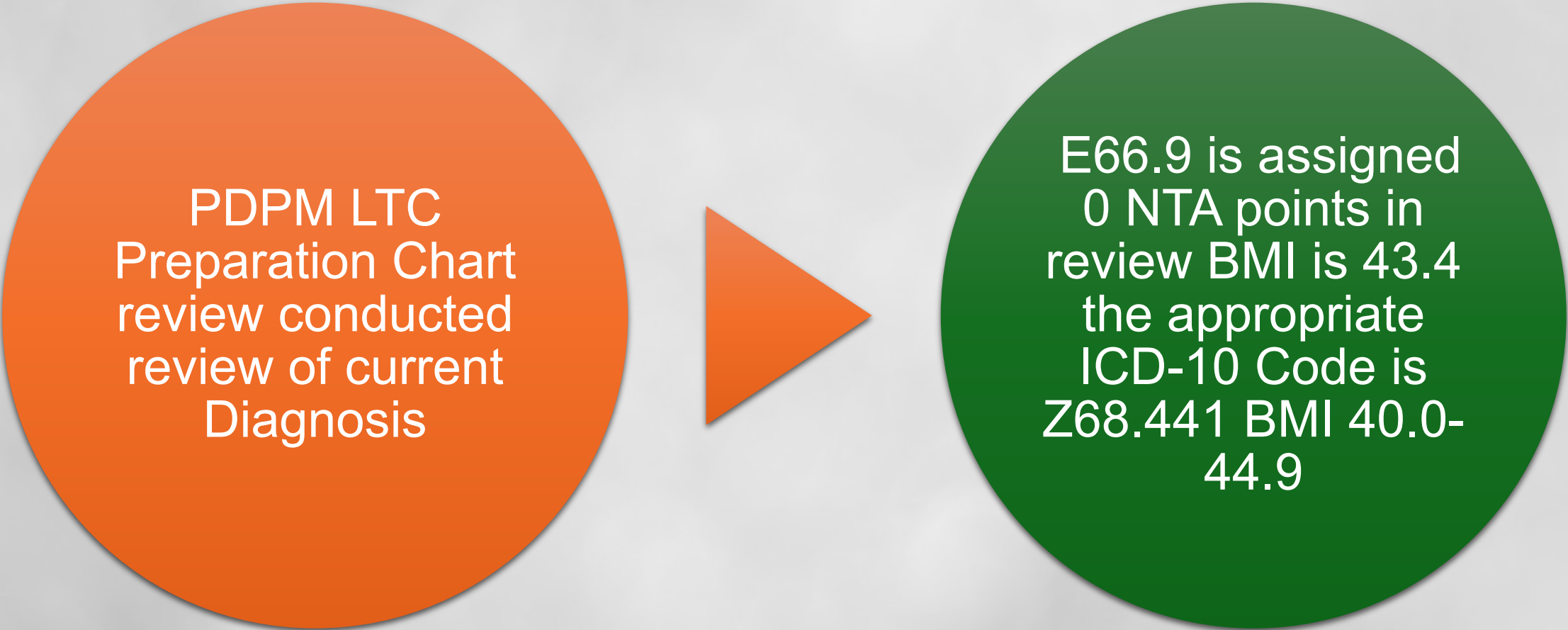
## Resources and Tools

- CMS NTA Mapping
  - <https://www.cms.gov/medicare/payment/prospective-payment-systems/skilled-nursing-facility-snf/patient-driven-model>
- SimpleLTC Diagnosis Explorer
- Medicare PDPG Grouper (NTA)

# PDPM LTC Preparation Diagnosis Review for NTA

- A single diagnosis can have many different ICD-10 codes because the ICD-10 system has detailed and specific codes designed to reflect very specific variations of a condition therefore each variation gets its own unique code.
- To capture NTA points current diagnosis may need to be updated to more specific codes to map to an NTA category .
- A complete review of current Diagnosis is a preparation task that my need physician review to update the assigned ICD-10 codes to specific codes that defines the clinical status specifically.

# Types of Obesity



```
graph LR; A((PDPM LTC Preparation Chart review conducted review of current Diagnosis)) --> B((E66.9 is assigned 0 NTA points in review BMI is 43.4 the appropriate ICD-10 Code is Z68.441 BMI 40.0-44.9))
```

PDPM LTC  
Preparation Chart  
review conducted  
review of current  
Diagnosis

E66.9 is assigned  
0 NTA points in  
review BMI is 43.4  
the appropriate  
ICD-10 Code is  
Z68.441 BMI 40.0-  
44.9

# PDPM LTC NTA Points - Groups

Group 1	Group 2	Group 3
9+ Points	3-8 Points	0-2 Points

# Texas PDPM LTC Payment Groups

Nursing Group		NTA Group		BIMS Group		HIV/AIDS Add On		Non-Case Mix
E	Extensive Services	1	9+	Y	Severe Cognitive Impairment	Y	Claims	Paid to All
H	Special Care High	2	3-8	X	Cognitive Impairment Not Severe	X		
L	Special Care Low	3	0-2					
C	Clinical Complex							
P	Reduced Physical Function							
B	Behavioral and Cognitive Symptoms							

**72 Possible Combinations**

Resident captured 7 Days of Incentive Spirometer , NTA captured 10 points , and did not have a cognitive or HIV

PDPMLTC = H1X

A PDPM LTC Worksheet will be available late Summer

# BIMS

BIMS- Severe Cognitive Impairment captures 5% of the CMI

C0500 (BIMS resident interview = 99 or blank, meaning the patient could not complete the interview or the interview was not done) **AND:** B0100 Comatose = 1 (meaning in a coma)

**OR:**

C1000 Impaired cognitive skills = 3 (meaning the patient has severely impaired cognitive skills)

Interview Process well documented of the date the interview was conducted

**\*\*\*\*\* We anticipate an update to the BIMS scores of capturing the Add On**



# HIV/AIDS 18% Add On

HIV/AIDSs Must meet the RAI Criteria and is a confidential Dx in Texas that cannot be coded on the MDS

## RAI Criteria Section I:

- Physician Documented in the 60-day look back
- Active in the 7-Day look back
- Must be added to the Claim to receive the additional payment

**\*\*\*\*\* Consider a process to validate with billing the B20 is documented as Active and meets criteria to add to the Claim**

## Build Your framework

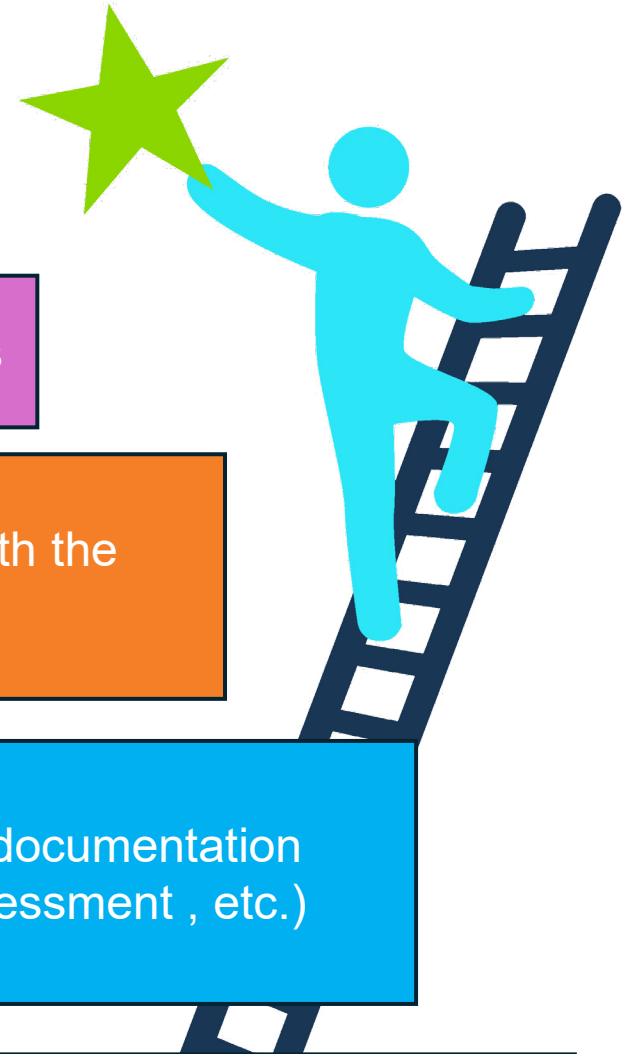
Section GG IDT Process

Implementation of clinical programs

Review and update Diagnosis to align with the PDPM Mapping

Evaluate current order Templates and structured documentation forms ( Malnutrition Risk Assessments, Resp Assessment , etc.)

Evaluate and strengthen Physician Relationships and practices to obtain Physician Diagnosis reviews and documentation to support the Active status in the look back



# PDPM LTCMI Transition

**On Sept. 1, 2025, the Texas Medicaid & Healthcare Partnership (TMHP) Long-Term Care (LTC) Online Portal (LTCOP) will transition from RUGIII to PDPM LTC Model.**

## **Transition Details:**

- The RUGIII will continue to pay on the MESAV after 9/1 until the next OBRA MDS/LTCMI is completed.
- TMHP will use the ARD to determine which methodology to apply. ARD 8/31/2025 and prior will be a RUGIII.
- The LTCMI for PDPMLTC will be updated to remove item sets that are no longer valid and items that are duplicate from the MDS implementation date to remove the items may not occur until after the transition however data elements not needed may be grayed out until the LTCMI form can be fully revised.

# Texas HHS PDPM LTC Website

<https://pfd.hhs.texas.gov/long-term-services-supports/nursing-facility/patient-driven-payment-model-long-term-care-rate-setting-methodology-nursing-facilities>

**Webinar: Overview of the Proposed Nursing Facility Patient Driven Payment Long-Term Care (PDPM LTC) Rate Methodology.**

[View the April 12, 2024 Webinar Recording \(.wmv\)](#)

[View the April 12, 2024 Webinar Presentation \(.pdf\)](#)

[PDPM LTC Overview 4-12-24 Webinar-FAQ \(.pdf\)](#)

# Texas HHS Provider Finance

## Payment Rate Information

[Effective September 1, 2025 \(.pdf\)](#)

[Effective September 1, 2023 \(.pdf\)](#)

[Effective June 10, 2023-August 31, 2023 \(.pdf\)](#)

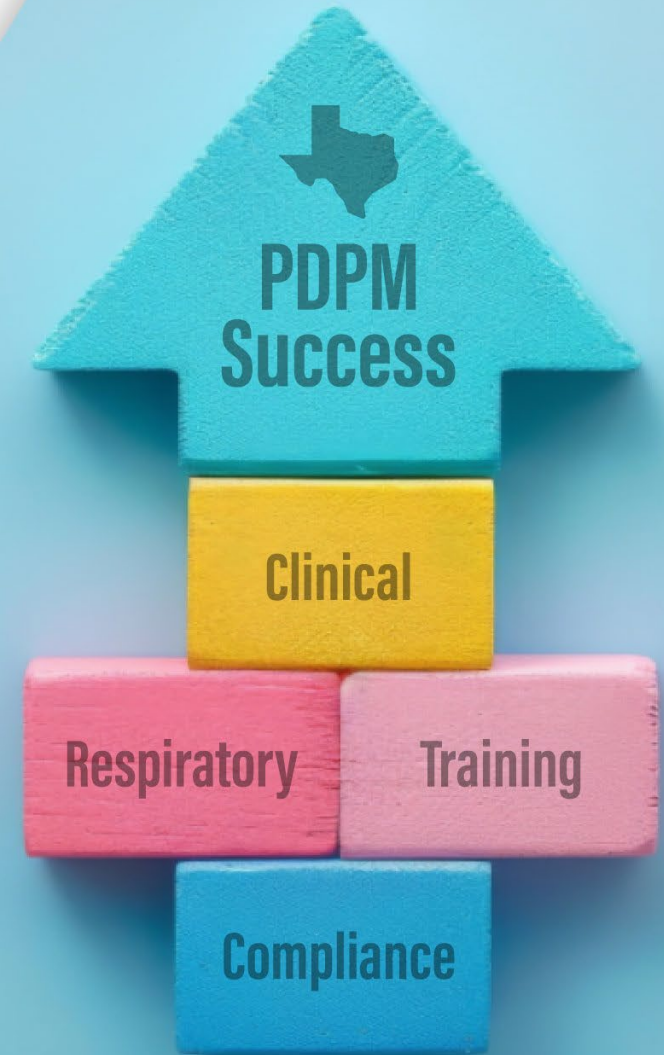
<https://pfd.hhs.texas.gov/long-term-services-supports/nursing-facility-nf>

**Texas Nursing Facility (NF) Medicaid Rates**  
**New Payment Rates Effective September 1, 2025**

PDPM Group	Bill Code *	Service Group	Service Code	Unit	Nursing rate component	NTA rate component	Non-Case Mix rate component **	BIMS rate component (5% of the highest Nursing Group rate)	Total Rate, effective 9/1/2025 ***
B1X	PD005	1	1	1 day	\$ 93.86	\$ 14.78	\$ 51.89	\$ -	\$ 160.53
B1Y	PD023	1	1	1 day	\$ 93.86	\$ 14.78	\$ 51.89	\$ 12.16	\$ 172.69
B2X	PD011	1	1	1 day	\$ 93.86	\$ 7.73	\$ 51.89	\$ -	\$ 153.48
B2Y	PD029	1	1	1 day	\$ 93.86	\$ 7.73	\$ 51.89	\$ 12.16	\$ 165.64
B3X	PD017	1	1	1 day	\$ 93.86	\$ 4.72	\$ 51.89	\$ -	\$ 150.47
B3Y	PD035	1	1	1 day	\$ 93.86	\$ 4.72	\$ 51.89	\$ 12.16	\$ 162.63
C1X	PD004	1	1	1 day	\$ 102.23	\$ 14.78	\$ 51.89	\$ -	\$ 168.90
C1Y	PD022	1	1	1 day	\$ 102.23	\$ 14.78	\$ 51.89	\$ 12.16	\$ 181.06
C2X	PD010	1	1	1 day	\$ 102.23	\$ 7.73	\$ 51.89	\$ -	\$ 161.85
C2Y	PD028	1	1	1 day	\$ 102.23	\$ 7.73	\$ 51.89	\$ 12.16	\$ 174.01
C3X	PD016	1	1	1 day	\$ 102.23	\$ 4.72	\$ 51.89	\$ -	\$ 158.84
C3Y	PD034	1	1	1 day	\$ 102.23	\$ 4.72	\$ 51.89	\$ 12.16	\$ 171.00
E1X	PD001	1	1	1 day	\$ 243.18	\$ 14.78	\$ 51.89	\$ -	\$ 309.85
E1Y	PD019	1	1	1 day	\$ 243.18	\$ 14.78	\$ 51.89	\$ 12.16	\$ 322.01
E2X	PD007	1	1	1 day	\$ 243.18	\$ 7.73	\$ 51.89	\$ -	\$ 302.80
E2Y	PD025	1	1	1 day	\$ 243.18	\$ 7.73	\$ 51.89	\$ 12.16	\$ 314.96
E3X	PD013	1	1	1 day	\$ 243.18	\$ 4.72	\$ 51.89	\$ -	\$ 299.79
E3Y	PD031	1	1	1 day	\$ 243.18	\$ 4.72	\$ 51.89	\$ 12.16	\$ 311.95
H1X	PD002	1	1	1 day	\$ 147.38	\$ 14.78	\$ 51.89	\$ -	\$ 214.05
H1Y	PD020	1	1	1 day	\$ 147.38	\$ 14.78	\$ 51.89	\$ 12.16	\$ 226.21
H2X	PD008	1	1	1 day	\$ 147.38	\$ 7.73	\$ 51.89	\$ -	\$ 207.00
H2Y	PD026	1	1	1 day	\$ 147.38	\$ 7.73	\$ 51.89	\$ 12.16	\$ 219.16
H3X	PD014	1	1	1 day	\$ 147.38	\$ 4.72	\$ 51.89	\$ -	\$ 203.99
H3Y	PD032	1	1	1 day	\$ 147.38	\$ 4.72	\$ 51.89	\$ 12.16	\$ 216.15
L1X	PD003	1	1	1 day	\$ 122.91	\$ 14.78	\$ 51.89	\$ -	\$ 189.58
L1Y	PD021	1	1	1 day	\$ 122.91	\$ 14.78	\$ 51.89	\$ 12.16	\$ 201.74
L2X	PD009	1	1	1 day	\$ 122.91	\$ 7.73	\$ 51.89	\$ -	\$ 182.53
L2Y	PD027	1	1	1 day	\$ 122.91	\$ 7.73	\$ 51.89	\$ 12.16	\$ 194.69
L3X	PD015	1	1	1 day	\$ 122.91	\$ 4.72	\$ 51.89	\$ -	\$ 179.52
L3Y	PD033	1	1	1 day	\$ 122.91	\$ 4.72	\$ 51.89	\$ 12.16	\$ 191.68
P1X	PD006	1	1	1 day	\$ 76.51	\$ 14.78	\$ 51.89	\$ -	\$ 143.18
P1Y	PD024	1	1	1 day	\$ 76.51	\$ 14.78	\$ 51.89	\$ 12.16	\$ 155.34
P2X	PD012	1	1	1 day	\$ 76.51	\$ 7.73	\$ 51.89	\$ -	\$ 136.13
P2Y	PD030	1	1	1 day	\$ 76.51	\$ 7.73	\$ 51.89	\$ 12.16	\$ 148.29
P3X	PD018	1	1	1 day	\$ 76.51	\$ 4.72	\$ 51.89	\$ -	\$ 133.12
P3Y	PD036	1	1	1 day	\$ 76.51	\$ 4.72	\$ 51.89	\$ 12.16	\$ 145.28
PCE	PD038	1	1	1 day	\$ 76.51	\$ 4.72	\$ 51.89	\$ -	\$ 133.12
Z01	PD037	1	1	1 day	\$ 76.51	\$ 4.72	\$ 51.89	\$ -	\$ 133.12

Maintaining a  
**Compliant  
Respiratory  
Therapy  
Program**

*What it takes*



# Learning Objectives – Respiratory Therapy

## Coding Convention

Learn how to accurately code respiratory therapy on the MDS

## Best Practices

Understand Clinical Best Practices of a Respiratory Therapy Program

## Training Requirement

Learn how to maintaining a compliant training program



# Respiratory Therapy: A High-Impact Clinical Strategy



Qualifies under **Special Care High** nursing category ( $\geq 15$  min/day for 7 days)  
+ (GG Function Score must be  $\leq 14$ )



Up to **50% of residents** may meet criteria with chronic, acute, or shallow breathing issues



Drives both clinical value and Medicaid reimbursement



Aligns with PDPM's shift to clinically complex, acuity-driven care

# MDS Coding Convention: Claiming RT

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## **Medical Necessity**

Services must be reasonable and necessary for the resident's condition.

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## **Evaluation by Qualified Personnel**

Initial evaluation must be completed by a respiratory therapist or trained respiratory nurse.

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## **Treatment Plan Based on Evaluation**

A written treatment plan must be developed based on the initial evaluation.

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## **Physician Order with Specifics**

RT must be ordered by a physician and include modality, frequency, duration, and scope.

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## **Provided by Qualified Personnel**

Therapy must be administered by a respiratory therapist or a nurse specifically trained in respiratory therapy.

# MDS Coding: Minutes That Count

Resident  
evaluation/assessment by  
qualified personnel



Treatment administration



Monitoring during treatment



Setup and removal of  
treatment equipment

# MDS Coding: Minutes That Do Not Count

Resident self-  
administered nebulizers  
without supervision



Documentation time



Initial evaluation not  
delivered by qualified  
personnel

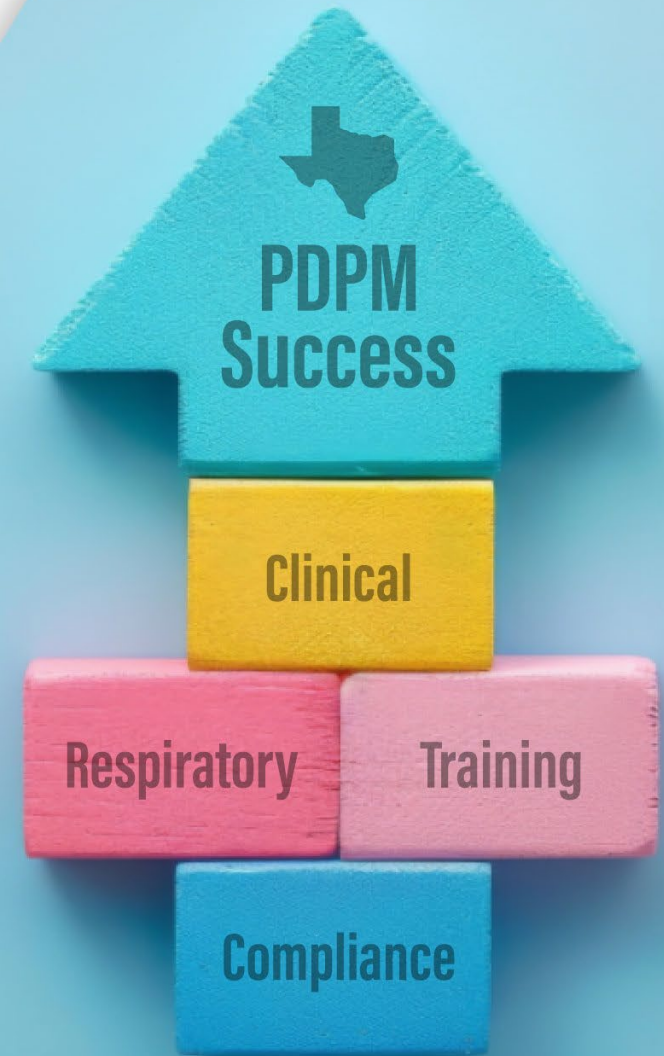
# Best Practices for Respiratory Therapy

<b>Implement</b>	<b>Implement Evidence-Based Practice (EBP):</b> Use current research to guide high-quality, comprehensive respiratory therapy services.
<b>Establish</b>	<b>Establish Structured Training Programs:</b> Provide standardized education for essential staff across all shifts, including annual skills assessments to maintain competency.
<b>Reinforce</b>	<b>Reinforce Clinical Systems Support:</b> Ensure respiratory therapy integration aligns with key facility systems such as infection control, medication management, and interdisciplinary communication.
<b>Foster</b>	<b>Foster Core Values in Care Delivery:</b> Emphasize care, compassion, competency, communication, courage, and commitment in every aspect of respiratory therapy.
<b>Maintain</b>	<b>Maintain Strong Documentation Standards:</b> Accurately document evaluations, treatment plans, session minutes, and outcomes to support compliance and reimbursement.

Maintaining a

# **Compliant Respiratory Therapy Training Program**

*What it takes*



# Clinical Services Depend on **Qualified Staff**

**Respiratory therapy is a high-impact service under PDPM and Texas Medicaid.**

*But services must be:*

- **Clinically appropriate** – with established medical necessity
- **Properly documented** – according to RAI guidelines
- **Delivered by qualified staff** – trained by a Registered Respiratory Therapist (RRT)



# Key **Training** Requirements

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**To remain compliant, your program must ensure:**

- All staff administering therapy are **trained in each modality** they provide
- Training is delivered or validated by a **credentialed RRT**
- You can produce **successful completion of training** upon request

# Possible **Approaches**

Every approach must answer:

Are **all** nurses administering therapy trained in **each** modality?

Was the training delivered or overseen by an **RRT**?

Do we have current **records** of completed training?

*Can we maintain our approach across shifts, staff changes, and audits?*

# Periodic **In-Person Training** with an RRT

Certification of instructor is given but logistics are challenging.

Requires you to ensure full coverage despite **turnover** and **shift** coverage.

Needs **relationship** and **coordination** with an RRT to deliver training.

Can be difficult to **maintain** up to date **records** of in-person events.

*In most cases, this is the most expensive option.*

# Internally Developed Program

More flexible training logistics but difficult to ensure compliance.

Requires ongoing **validation** and **compliance** with state regulations.

Must verify content is **informed** by RRT and covers all **modalities**.

Record of **training** must be internally maintained.

*Cost can be high to maintain.*

# Online Learning Platform

On-demand training and simple reporting but must be validated.

Must scale to **all nursing staff** to ensure full coverage.

Content must be **informed** by RRT and cover all **modalities**.

Must provide accessible record of **training**.

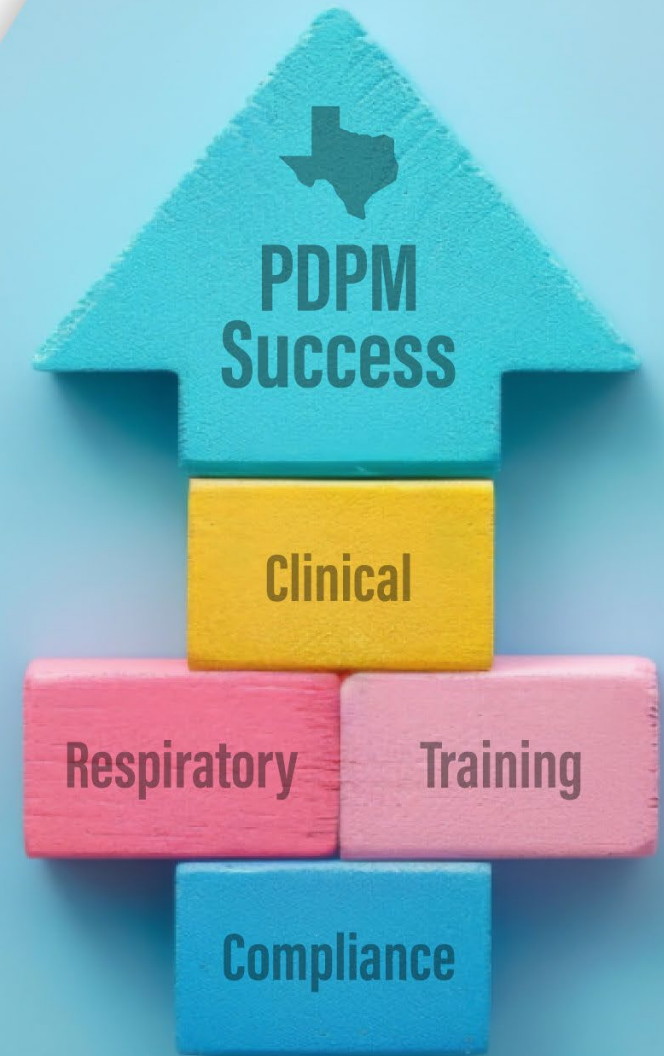
# A Tailored Texas Solution

**Carebility Respiratory Therapy Certification Program** was developed in partnership with TMC and Al Hoak, RRT, and in consultation with HHSC Policy and the Office of Inspector General (OIG).

- Covers MDS-reportable **modalities**
- Developed with **credentialed RRT**
- **Automatic tracking** to verify training and competency
- **No per seat pricing** to scale with your staffing needs
- Training on **proper documentation** for Texas



Staying Current with  
**Regulatory  
updates:  
Texas PDPM  
LTC**





# Regulatory Updates: Texas PDPM LTC

**HHSC Provider Finance:** Updated Medicaid rates will be posted soon

**HHSC Provider Finance (Tentative):** Considering adding a cognitive qualifier (BIMS score of 0–7) in addition to **Severely Impaired** criteria — no final decision yet

**TMC, OIG, and HHSC Policy:** Ongoing collaboration to clarify documentation expectations, especially regarding **GG scoring** and other areas new to Utilization Review (UR)

## **HHSC Policy (LTCMI Update):**

- All RUG-related items on the LTCMI form will be **greyed out** after 9/1 transition
- HHSC has agreed to **streamline the LTCMI**, removing redundant and unnecessary clinical items — changes will occur **after** PDPM implementation

**TMC & State Agencies:** Additional meetings planned to address provider concerns and support a successful transition

# RUG Certification & PDPM Transition (HHS Policy & OIG)



**PDPM LTC replaces RUG**  
methodology effective  
**Sept. 1, 2025**, following  
CMS guidelines



New training content and  
platform will be available  
**by Sept. 1, 2025**, at **no**  
**cost**



**Certification grace period:**  
Those expiring between Sept.  
1–Nov. 30, 2025, have until  
**Nov. 30** to complete the  
updated training



**RUG Certification**  
**Training via Texas State**  
**University** will end **June**  
**16, 2025**



**June 16–Aug. 31, 2025:**  
Assessors must submit a  
form on the TXST site to  
maintain certification status

SimpleComplete™

# One simple suite for SNF success

The industry's only complete solution  
for reimbursement, referrals and  
regulatory compliance.



## MDS predictive analytics.

Optimize PDPM,  
Five-Star/QMs and  
iQIES workflow



## PBJ and staffing.

Simplify Payroll-  
Based Journal and  
staffing strategy



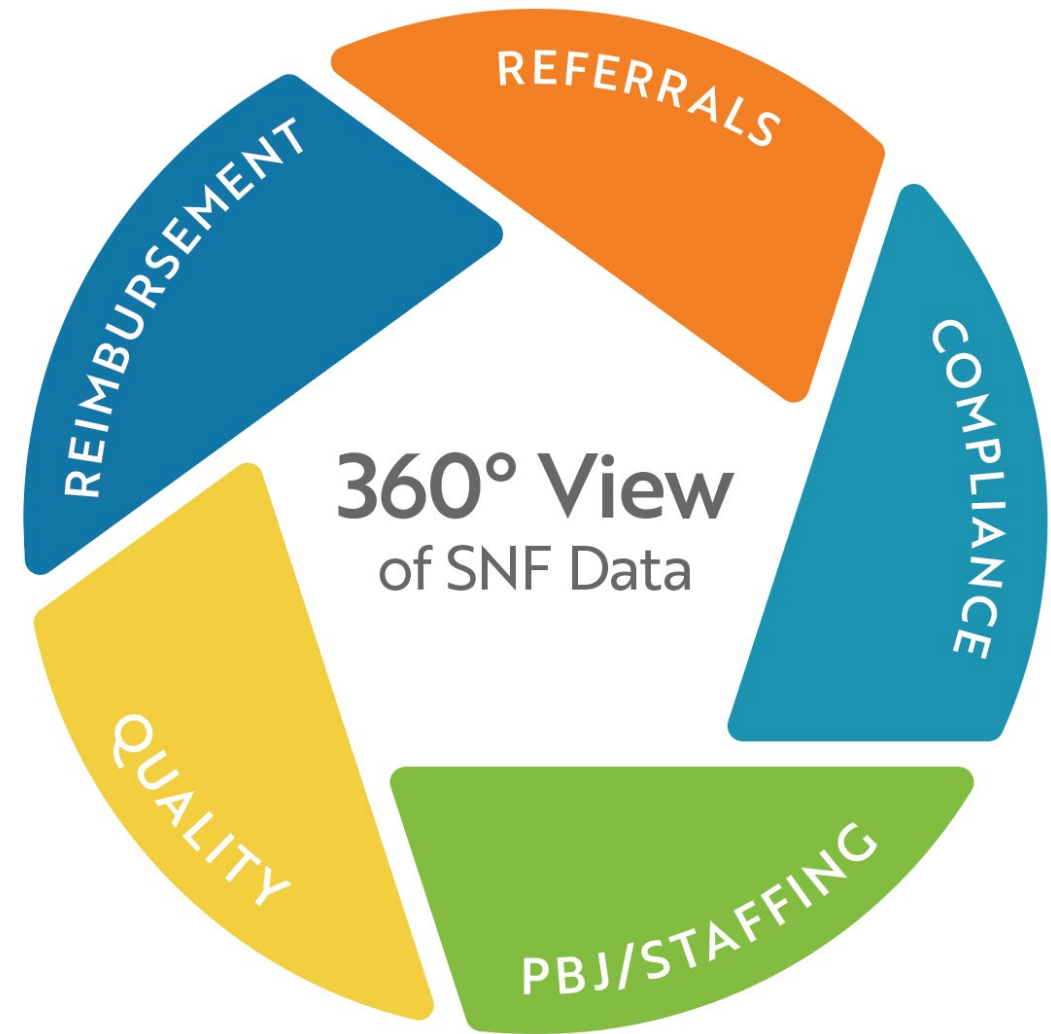
## Referrals and reimbursement.

Build census and  
optimize claims  
revenue in real-time



## QIPP Year 8 performance.

Track metrics in real-  
time against QIPP  
performance metrics

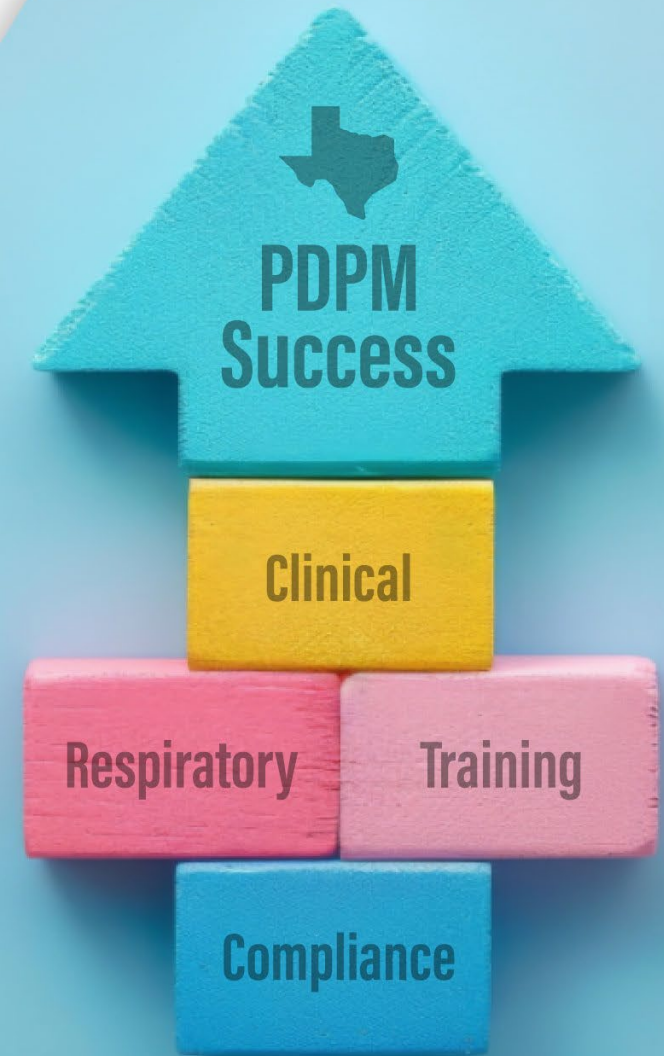


Scan code or visit [simpleltc.com/demo](https://simpleltc.com/demo) to get started



# Q&A

## Building Blocks of Texas PDPM



# Thanks for joining us!

Recording/slides will be available at:

[simple.health/blog](https://simple.health/blog)

