

Part B Insider (Multispecialty) Coding Alert

HOSPICE: Remember Doc Attestation for New Hospice Narrative

Part of your Medicare payments could be at stake.

If you wait for medical reviewers to ferret out your problems with the new physician hospice narrative requirement, you could be in a world of hurt payment-wise.

Hospices actually seem to be doing OK with the narrative portion of the new requirement that went into effect Oct. 1, indicates regional home health intermediary Cahaba GBA. "Many hospices are complying with the use of the physician narrative requirement," the intermediary reports in an email message to providers.

Background: Under the new requirement, CMS requires the certifying physician to include a brief narrative explaining the clinical findings that support a life expectancy of six months or less.

The same physician who certifies the patient must compose the narrative, Cahaba adds.

But the attestation part of the narrative rule is throwing hospices for a loop. Often, "the attestation statement is missing," Cahaba says.

According to Cahaba, their "medical review staff will deny hospice claims which do not include this attestation statement on the narrative for the certification/recertification."

What it is: The attestation is a statement under the physician's signature that says "by signing, the physician confirms that he/she composed the narrative based on his/her review of the patient's medical record or, if applicable, his/her examination of the patient," RHHI Palmetto GBA notes on its Web site. Hospices are likely confusing the narrative and the attestation components of the new requirement, suspects hospice expert **Jay Mahoney** with Summit Business Group in Penfield, N.Y. "I'm not sure that all hospices fully understand that there is a difference between the attestation statement and the narrative," says Mahoney, former head of the National Hospice Organization.

And some hospices simply may not be up to speed on the requirement yet, Mahoney adds. "While I don't think it is a valid excuse, some hospices ... just haven't fully processed the requirement," Mahoney tells Eli. "If they continue to have their claims paid, they may not yet understand that they are not in full compliance."

Hospices should decide on the language they want physicians to use in the attestation and preprint it on their cert/recert forms, Mahoney advises. "There has been so much more emphasis on obtaining the physician narrative that some hospices have likely neglected to change their forms to contain the attestation," he says. "This may also be an issue with computerized forms."

Tip: Check with your payer to determine whether it recommends which specific forms you should use, or if they have a suggested format.