

## Part B Insider (Multispecialty) Coding Alert

### Physician Notes: CMS Wants to Ensure That You Don't Miss The ICD-10 Boat

**Plus: OIG nursing facility guidance offers direction on goals, risks that you could face in the coming year**

The news that CMS intends to implement ICD-10 by 2011 is just sinking in for some coders, but CMS is already trying to prepare practices around the country for the big change that you'll face in three years.

CMS intends to host a series of conference calls including Q&A sessions which will cover the ways in which ICD-10 will differ from the current ICD-9 system.

If you are puzzled by the differences in code lengths or other disparities between the current method and ICD-10, tune into the calls on Oct. 14 (for hospitals), Nov. 12 (for other Part A and Part B providers), or Nov. 17 (for physicians). Or you can simply check out CMS' powerpoint presentation on the topic.

Both can be accessed online at <http://www.cms.hhs.gov/ICD10>.

#### In other news ...

• **Hospices shouldn't have to do all the heavy lifting when it comes to compliance for patients in nursing homes.**

The OIG has issued its new voluntary supplemental compliance program guidance for nursing facilities, and the guidance contains hospice provisions.

**For example:** It's a kickback if a hospice nurse provides nursing services for non-hospice patients at no charge, the guidance makes clear.

Arrangements between nursing homes and hospices "pose several fraud and abuse risks," the OIG warns. Additional room and board payments, inflated payment rates for contracted hospice services, and referring patients to nursing homes in exchange for receiving their hospice referrals are just some of the kickback dangers the OIG names.

**Hot spot:** Watch out for reserved bed agreements with nursing homes, the OIG adds. They could be a kickback risk depending on how they are arranged. Under reserved bed agreements, nursing homes keep beds open for hospice patients in exchange for payment.

The guidance is in the Sept. 30 Federal Register and posted online at [http://oig.hhs.gov/fraud/docs/complianceguidance/nhg\\_fr.pdf](http://oig.hhs.gov/fraud/docs/complianceguidance/nhg_fr.pdf).