

Eli's Hospice Insider

Compliance: Deeds Long Past Still Make It Onto The Disclosable Event List

Check out the new criteria for required reporting.

Once you figure out who your affiliates are under the new program integrity final rule, you'll need to determine whether they have a disclosable event you'll need to report.

If the **Centers for Medicare & Medicaid Services** requests it, you'll need to report any affiliated provider that (emphasis added):

- (1) currently has an uncollected debt to Medicare, Medicaid, or CHIP, **regardless of the amount, repayment status, or appeal status;**
- (2) has been or is subject to a payment suspension under a federal health care program, **regardless of when the payment suspension occurred or was imposed;**
- (3) has been or is excluded by the **HHS Office of Inspector General** from participation in Medicare, Medicaid, or CHIP, **regardless of whether the exclusion is currently being appealed or when the exclusion occurred or was imposed;** or
- (4) has had its Medicare, Medicaid, or CHIP enrollment denied, revoked, or terminated, **regardless of the reason, appeal status, and timing.**