

Eli's Hospice Insider

Compliance: Stay Out Of Drug-Related Hot Water With These 4 Tips

Head off issues ranging from survey dings to reimbursement-seeking pharmacies with prudent steps.

While getting drug coverage-related errors down to zero isn't realistic, there are measures you can implement to improve your record in this hot topic area.

"Everyone can play a role in reducing the incidence of coverage errors," says **Theresa Forster** with the **National Association for Home Care & Hospice**. Heed this expert advice to stay on good terms with auditors, surveyors, and provider partners:

1. Educate patients. "Each hospice should be examining its practices and making certain that it is doing all it can to educate patients and families about prescription drug coverage and responsibility," Forster urges. That included holding "discussions around drugs that will not be covered by the hospice because they are not reasonable and necessary," she adds.

2. Educate SNF partners. A high number of the errors uncovered in the **HHS Office of Inspector General's** latest report on double billing for hospice patients' drugs occurred when skilled nursing facility staff and pharmacies billed Part D for drugs (see story, p. 78), notes attorney **Robert Markette Jr.** with **Hall Render** in Indianapolis.

Don't be surprised to see audits for those SNF pharmacy claims ramp up, and those providers to come to you when the claims get denied. Head off those problems with education up front.

3. Beef up documentation. "If we don't think it's covered, we need to be able to defend that decision," Markette says of drugs for hospice patients. Be sure the medical record does so clearly and compellingly.

Plus: Focus on making the election statement addendum as strong as possible when it comes to the topic, he adds.

4. Improve Part D procedures. Increased use of the Hospice Information for Part D Plans form can help stave off payment errors. You can use the document, which is part of the already existing Part D prior authorization process, "proactively and to the fullest extent possible," Forster recommends.

Reminder: Hospices "can use the standardized PA form as a means of notifying a Part D plan that their member has elected hospice care, as well as to document specific drugs that are or are not being covered by the hospice," CMS explains in the 2020 hospice payment final rule.