

Eli's Hospice Insider

Finance: Are You Aware Of The Latest Hospice Cap Reporting Changes?

This year's cap deadline is fast approaching.

You might be worried about previous years' cap-related overpayments (see cover story), but don't forget to pay attention to this year's cap calculation too. Now that Jan. 31 has passed, you can calculate your own cap status for 2016 and must submit your calculation ☐ as well as any related overpayments ☐ by March 31.

"Failure to file the Cap calculation on a timely basis and address any Cap-related liability will result in payment suspension," warns the **National Association for Home Care & Hospice**.

Reminder: "Hospices should bear in mind that their calculation of their estimated aggregate Cap will not include the impact of the sequester," NAHC stresses. "When the MACs finalize the 2016 aggregate Cap determinations later this year, their calculations will include the sequester." So if your estimated cap calculation puts you over the cap or even close to it, "you should plan accordingly for a potential Cap liability linked to the final MAC determination later this year," the trade group advises.

Keep in mind that CMS is in the process of shifting hospices' cap year, attorney **Brian Daucher** with **Sheppard Mullin** says on the law firm's website. "Traditionally, the cap accounting year has ended October 31, putting the cap accounting year one month off of the Federal government fiscal year," Daucher explains. In 2017, CMS will switch that to a Sept. 31 year-end.

However, the change will affect the cap calculation and reporting you will complete next year. You and the MACs will assess the cap "across only 11 months from November 2016 through September 2017," Daucher says. That will move next year's cap reporting deadline up to February, he adds.

Plus: Providers using the streamlined methodology will see some additional changes. More details are in Daucher's article at www.hospicelaw.com/2017/01/hospice-cap-calculation-changes.