

Eli's Hospice Insider

Finance: You Can't Afford To Be Late On Cap Self-Reporting

Caution: It may take extra time to get your PS&R data this year.

If you fail to submit your cap report by Feb. 28, it won't result in a mere slap on the wrist.

Hospices that don't submit self-determined hospice cap reports to their HHH Medicare Administrative Contractor **CGS** by the Feb. 28 deadline will see the MAC start withholding their reimbursement March 7, CGS warns in a message to providers.

And it may not be easy to get back off that withhold right away. "CGS processes SD Cap submissions on a First In First Out basis," the MAC says. "If your agency is put on withhold, [the] possibility exists you could stay on withhold for several days after we receive your submission, depending on [the] number in front of you to be reviewed."

"Suspension of Medicare payments" resulting from failing to report your cap "can have a serious impact on cash flow," warns **Sandy McCleve** with **Advantage Healthcare Consulting Cost Report & Reimbursement** in Utah.

Don't forget: Any overpayments "must be remitted back to the MAC upon filing," McCleve reminds providers. But you can apply for an extended repayment schedule (ERS).

That's why "we recommend securing the PS&R data at the earliest available date to minimize any current liability that may exist," says consulting firm **The Health Group** in Morgantown, West Virginia, in its electronic newsletter. "If your hospice has a cap liability, you have until February 28, 2019 to submit the cap Report and the ERS Request even if you secured the PS&R data on January 4, 2019," it says.

Watch out: Factor in all time required to generate the report. For example, for the first time, "providers will be required to obtain their own PS&R data in order to complete the Self-Determined Hospice Cap report," says HHH Medicare Administrative Contractor **Palmetto GBA** in a message to providers. "We will not be furnishing this data to all providers as done in prior years. If you do not have access to the EIDM system, you should register now."

There's another good reason to download your data ASAP too, McCleve points out: "Assess your agency's situation now, so there are no surprises when you go to file," he advises. "You will then have adequate time to gather all the necessary information together to apply for and file an ERS."

Note: More cap report submission information and advice from Advantage is at <https://advantagehcconsulting.com/blog/2019/01/09/hospice-cap-reporting-are-you-prepared-to-file-2>.