

Eli's Hospice Insider

Hospice Item Set: New 30-Day HIS Submission Deadline Starts In January

You'll lose out on payment if you don't meet the threshold.

Nearly a quarter of hospices wouldn't meet a newly finalized HIS submission threshold if they performed as they did in 2014.

The **Centers for Medicare & Medicaid Services** has finalized its proposal to set thresholds topping out at 90 percent for Hospice Item Set submission. In its 2016 final rule for hospice payment, CMS sets these new benchmarks:

- Jan. 1, 2016 to Dec. 31, 2016: hospices must submit at least 70 percent of all required HIS records within a 30-day submission timeframe or face a 2 percent reduction to their market basket update for FY 2018.
- Jan. 1, 2017 to Dec. 31, 2017: at least 80 percent for all HIS records received within the 30-day submission timeframe or face a 2 percent reduction to their update for FY 2019.
- Jan. 1, 2018 to Dec. 31, 2018: at least 90 percent for all HIS records received within the 30-day submission timeframe or face a 2 percent reduction to their update for FY 2020.

Analysis of 2014 Quarter 3 and Quarter 4 HIS data shows that 92 percent would have met the compliance thresholds at 70 percent; 88 percent would have met 80 percent; and 78 percent of hospices would have met the 90 percent goal. "CMS believes this analysis is further evidence that these proposed compliance thresholds are reasonable and achievable by hospice providers," it says in the rule.

What date? Under the rule, all HIS-Admission and HIS-Discharge records must be submitted within 30 days of the Event Date (the patient's admission date or discharge date), CMS explains.

Track Your HIS Numbers Now

"The current reports available to providers in the CASPER system do allow providers to track the number of HIS records that are submitted within the 30-day submission timeframe," CMS advises in the rule. "Currently, submitting an HIS record past the 30-day submission timeframe results in a non-fatal (warning) error."

Plus: "In April 2015, CMS made available three new Hospice Reports in CASPER, which include reports that can list HIS Record Errors by Field by Provider and HIS records with a specific error number," the agency adds.

Watch for more HIS submission info down the line. "CMS will consider expanding this functionality in the future to tailor reporting functions to the exact data submission and compliance thresholds," according to the rule.

Exemptions allowed: "The [threshold calculation] methodology would be appropriately adjusted for cases where hospices were granted extensions/exemptions, and instances of modification/inactivation requests so that these instances did not 'count against' providers in the proposed compliance threshold calculation," it reveals in the rule.

Take note: New providers must begin submitting their HIS records on the date they receive their CMS Certification Number notification letter from CMS, the agency adds in the rule.

