

Eli's Hospice Insider

Hospice News: Inpatient Hospices A Likely Target For TPE

If you want Targeted Probe and Educate review to go away quick and easy, make sure you are filling out the related paperwork correctly.

Under TPE, "CGS may request and accept new documentation from providers/suppliers when easily curable errors are identified at any time during the current round of probe reviews," the HHH Medicare Administrative Contractor says in a new message to providers. "The TPE notification letter includes a form to designate the agency's point of contact for the medical review team. Please return the completed form with each ADR response," CGS stresses.

Tip: Providers should include "a working telephone number and email address" for the contact, HHH MAC National Government Services instructs in its most recent medical review newsletter.



For many hospices, though, it won't be so simple to get through TPE. Both NGS and Palmetto GBA have listed General Inpatient (GIP) claims for stays of seven days or more as targets under TPE.

"Targeted hospices will undoubtedly feel the burden of additional audit activity, especially when care remains in a fragile state during the COVID-19 pandemic with an ongoing nursing shortage in many areas," say attorney **Howard Young** and health policy analyst **Kathleen Rubinstein** with law firm Morgan Lewis.

Watch out: "These renewed TPE audits may target hospices with hospice inpatient units, as those hospices have historically had longer GIP stays," Young and Rubinstein note in online analysis.

The focus shouldn't come as a surprise. The HHS Office of Inspector General has targeted longer GIP stays of five days or more for scrutiny, Young and Rubinstein note.