

## Eli's Hospice Insider

### Medical Review: Don't Let Physicians Off The Hook On Hospice Narratives, MAC Stresses

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Warning: A vague attestation statement could torpedo your claim.

When medical reviewers find your hospice certifications inadequate, it can mean big denial numbers, so you need to make sure your certs comply with all requirements.

"During CGS's review of hospice documentation by medical review staff, we have identified several attestation statements that do not clearly indicate that the physician was the one that composed the narrative," the HHH Medicare Administrative Contractor says in a recent provider news bulletin.

**Reminder:** "By signing the form, the physician confirms that he/she composed the narrative based on his/her review of the patient's medical record or his/her examination of the patient," CGS says. "Statements such as 'I confirm that this narrative is based on my review of the patient's medical record and/or examination of the patient' do not specifically indicate that the physician actually composed the narrative," the MAC adds.

**Pitfall:** "CGS has had instances where a physician has signed certifications with this type of attestation statement, and upon further research, it was determined that the non-physician practitioner actually composed the certification narrative for the physician to sign, which is not compliant with the regulations," the MAC says.

**Do this:** "CGS strongly recommends that providers review their certification/recertification attestation statements to ensure they are in compliance ... and that the statements clearly indicate who composed the certification narrative. Although the guidelines do not mandate specific verbiage, attestation statements that do not clearly indicate the certifying physician composed the narrative may result in a denial for an invalid certification/recertification," the MAC warns.

Note: See the news bulletin at [http://cgsmedicare.com/hhh/pubs/mb\\_hhh/2014/01\\_2014/PDFs/HHH\\_Bulletin\\_Jan14.pdf](http://cgsmedicare.com/hhh/pubs/mb_hhh/2014/01_2014/PDFs/HHH_Bulletin_Jan14.pdf).