

Eli's Hospice Insider

Medical Review: Expect Emphasis On The New Addendum As Medical Review Gets Back Up To Speed

Addendum signatures are a payment requirement, MAC warns.

Will your hospice addendum policies and procedures pass muster under increased scrutiny? You're likely to soon find out.

Reminder: Hospices must furnish an addendum upon request that "list[s] those items, services, and drugs the hospice has determined to be unrelated to the terminal illness and related conditions, increasing coverage transparency for beneficiaries under a hospice election," the Centers for Medicare & Medicaid Services said in its 2021 hospice final rule. That requirement took effect in October 2020.

CMS recently announced that it's resuming post-payment medical review for claims during the COVID-19 public health emergency - which includes dates that the new hospice addendum has been required.

If you're hoping HHH Medicare Administrative Contractors will give you a break on the new addendum, it's time to stop hoping.



Question: "Will MACs be reviewing for signed addendum in the patient's medical record?" reads a question in Palmetto GBA's recently posted Hospice Beneficiary Election Statement Addendum Frequently Asked Questions.

Answer: "MACs will review for signed addendums within the requesting beneficiary's medical record," Palmetto confirms.

In its 2022 hospice proposed rule, CMS gave hospices a little comfort in situations where patients or their representatives refuse to sign addendum documents (see Hospice Insider, Vol. 14, No. 6). For example, hospices can document that they furnished the addendum and include the date.

But many issues remain, and they are putting hospice reimbursement at risk. "The addendum is a condition for payment. If the requirements are not met, including the timeframe for furnishing the addendum, this is a violation of the condition for payment and would result in a claim denial," Palmetto says in another FAQ in the set.

One upside: "As per the Medicare Benefit Policy Manual, this denial is limited to only the claim subject to review and would not invalidate the entire election," Palmetto acknowledges.

Note: Palmetto's 10-page, 27-question addendum FAQ set is at [www.palmettogba.com/Palmetto/Providers.Nsf/files/Multi_MAC_Hospice_Addendum_FAQs_CMS_Revisions_FINAL.pdf/\\$File/Multi_MAC_Hospice_Addendum_FAQs_CMS_Revisions_FINAL.pdf](http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Multi_MAC_Hospice_Addendum_FAQs_CMS_Revisions_FINAL.pdf/$File/Multi_MAC_Hospice_Addendum_FAQs_CMS_Revisions_FINAL.pdf).