

Eli's Hospice Insider

Payment: Hit Your March 31 Cap Reporting Deadline

Don't get blindsided by unexpected liabilities.

If you haven't yet done so, you should run the necessary reports to calculate and report your 2015 cap as soon as possible, experts urge.

Remember: Last year, the **Centers for Medicare & Medicaid** Services began requiring hospices to calculate and report their own per beneficiary cap by March 31. The cap is based on Provider & Statistical Report data and beneficiary counts accessed through the EIDM system. (Last year's initial cap reporting period was marred by CMS's flubbed transition from IACS to EIDM.)

Now that Jan. 31 is past, "hospices should secure beneficiary counts through EIDM for purposes of preparing the 2015 cap year self-reporting," urges **The Health Group** in Morgantown, W. Va., in its newsletter. "Hospices should make certain they have access to EIDM and all passwords have been updated to facilitate their ability to secure beneficiary counts and PS&R data needed to complete the cap self-reporting."

Securing the reports as early as possible minimizes the liability you will owe based on this preliminary report, experts note.

Last year, HHH Medicare Administrative Contractor **Palmetto GBA** issued data reports to HHAs, but this year agencies appear to be on their own, notes attorney **Brian Daucher** with **Sheppard Mullin** in Costa Mesa, Calif.

It's nice to put off owing a cap overpayment, or part of one, now. But don't get a rude surprise on the back end.

"The self-reporting requirement ... simply comes too soon after the end of the hospice cap year (i.e., three months after) to give a reliable picture of a hospice's cap liability," Daucher criticizes. "Because cap allowances continue to shift after year end based upon further services rendered to patients in the new year, hospices may see no liability in February-March, but ultimately face material liability," he cautions.

Warning: "If a hospice sees 'no liability' in this premature report, it could fail to recognize its peril," Daucher stresses.