

Eli's Hospice Insider

Regulations: Payment Reform Billing Errors May Still Be Plaguing Hospices

Plus: The Medicare Care Choices Model finally is gaining some momentum.

If you thought your under- and overpayments due to payment reform-related billing errors were over, you may need to think again.

Background: Hospices started being paid incorrectly for Routine Home Care and Service Intensity Add-on adjustment claims when payment reform took effect in January 2016. The **Centers for Medicare & Medicaid Services** corrected the payment system problems in 2017, but hospices have had to submit their own claims adjustments - either with a roster or via individual claim adjustments - to secure their correct reimbursement.

Now, CMS says it isn't sure if the payment system glitches are fixed after all.

The agency recently received information suggesting there are more unresolved issues with payment reform billing, a CMS official said in the agency's Jan. 17 Open Door Forum for home care and hospice providers. Investigations into the matter are ongoing.

For now, if you encounter what you believe to be payment errors, please bring them to your HHH Medicare Administrative Contractor's attention, the staffer urged.

See more about the billing reform problems and solutions online at www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/SE17014.pdf.

Other hospice issues addressed in the forum include:

MCCM. After a slow start, the Medicare Care Choices Model appears to be picking up steam. As of Jan. 1, hospices in cohort 2 began enrolling patients in the concurrent care demonstration, a CMS source said in the forum.

There are currently 99 hospices participating in the model, and as of December there were more than 1,500 patient enrolled in it, the CMS official revealed. "Our team is excited that we are starting to move forward and see the trend go upward," she said.

See more MCCM info at <https://innovation.cms.gov/initiatives/Medicare-Care-Choices>.

Hospice Compare. Don't expect the timeline for updating your demographic information on the Hospice Compare website to get shorter any time soon.

Reminder: CMS recently issued revised instructions for updating that info and warned that it may take up to six months for the new data to show up on the Compare site (see story, p. 20).

In response to a question about whether CMS can shorten that update lag, a CMS source noted that "we are aware that that timeline is pretty ... lengthy." Getting the various Medicare systems to relay information is the issue, the staffer said. "Unfortunately, until we can figure out maybe some ... system enhancements, that's the timeline we're looking at."

CAHPS. Don't be surprised if the CAHPS patient satisfaction data you receive from your vendor looks different than the data in your Hospice CAHPS Provider Preview Report, a CMS official said in the forum.

Why? "The preview reports show official CMS data, and that data is adjusted for case mix and mode," the staffer

explained. The adjustments aim to make comparisons between hospices "more fair," she said. "We are trying to remove the impact of who is answering the survey and what method" - mail, phone, or mixed (both).

A handful of providers asked for their recent preview report data to be formally reviewed, and the report data was found to all be correct, she related. The differences between the data in the December reports and the data reported to providers by their vendors were mostly due to those mode adjustments.

HQRP. Watch for two new training modules for the Hospice Quality Reporting Program to debut this March.

One session will focus on coding guidance for the Hospice Item Set, a CMS source told listeners. Based on frequently asked questions submitted to the hospice quality helpdesk, CMS has produced "refined coding guidance" for certain HIS items. The module will cover the refined guidance and examples for each section of the HIS.

The other session will provide information on navigating the various HQRP-related websites including QTSO, the CMS staffer added.

A live webinar in March will give an overview of the self-directed training modules and cover certain highlights, the CMS official said. Watch for forthcoming details at

www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting.