

Eli's Hospice Insider

Regulations: Sequestration Questions Dog Hospice Cap Calculations

Hospices wondering whether to include sequestration funds in their aggregate cap calculations are still up in the air.

Reminder: Cap calculations and any resulting overpayment amounts are due March 31 (see Eli's Hospice Insider, Vol. 8, No. 2).

But a spreadsheet and instructions from the **Centers for Medicare & Medicaid Services** have been delayed "because the Department of Health & Human Services (CMS) has under legal review consideration of whether the 2 percent sequester ... should or should not be included in calculation of a hospice's cap liability," reports the **National Association for Home Care & Hospice** in its member newsletter.

NAHC suggests calculating your cap with and without the sequestration amounts so you can anticipate liability if CMS does require inclusion of sequestration dollars in the calculation. Hospices may want to wait to submit their cap self-calculation until CMS resolves the issue, but by March 31, NAHC offers.

PS&R System Transition Cuts Both Ways

Meanwhile, a recent operational roadblock may be helping or hindering hospices in their cap calculation process, depending on how well prepared they were for the transition from the IACS to EIDM system. CMS announced a postponement to the switchover of the system that furnishes PS&R information, but that may be over quickly.

Pro: At press time, "access to PS&R continues to be available using existing IACS accounts," notes **Palmetto GBA** on its website.

Con: "Individuals will be unable to create new IACS accounts for accessing PS&R," Palmetto notes. That means you just have to sit tight and wait for the transition to EIDM to access your PS&R reports and calculate your cap. If that delay lasts too long, you may miss your two-month window to calculate and report your cap.

Hospices may make changes to existing IACS accounts, Palmetto notes. "But none of these changes will be carried over to the new EIDM accounts (i.e. Login, Change Password or Personal Information, or add/modify access to CMS applications, etc.)."