

## Eli's Hospice Insider

## Regulations: Use CMS's Playbook For Prior Authorization Forms

CMS wants your feedback on a future required PA form for hospice patients' drugs.

If you're wondering where to start when it comes to a prior authorization form for your hospice patients, CMS has some ideas.

"Many commenters recommended that we establish and require the use of a standard PA form," the **Centers for Medicare & Medicaid Services** acknowledges in its March 10 memo on the PA process that will start May 1. CMS doesn't have time for the rulemaking that would be required for a standard PA form to take effect in 2014. But in an attachment to the memo, the agency lists the data elements it would expect to request. In addition to a list of identifying and other information, CMS suggests these items:

"Is the medication related to the terminal illness or related conditions and covered under the hospice benefit?

If no, is the medication not covered by Hospice because:

a. It is being used for a condition unrelated to the terminal illness or related conditions? If so, please provide an explanation of why the condition being treated is unrelated to the terminal illness or related conditions and therefore is not covered under hospice benefit and may be covered under Medicare Part D.

b. It is being used for a condition related to the terminal illness or related conditions, but the medication is not included on the hospice formulary, is not medically necessary or is waived through the hospice election? Medicare Part D will not cover this medication."

"We seek suggestions for revisions to the listed items that may be incorporated into a standard form at a later date," CMS says. "In the meantime, to keep the process as straightforward and consistent as possible among Part D sponsors, we strongly recommend that the form sponsors employ be limited to the information needed for a hospice PA and be used exclusively for that purpose."

Note: See the full suggested form in Attachment 2 of the memo at <a href="https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Hospice/Downloads/Part-D-Payment-Hospice-Final-2014-Guidance.pdf">www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Hospice/Downloads/Part-D-Payment-Hospice-Final-2014-Guidance.pdf</a>.