

MDS Alert

What Do You Think?: When Can You Provide Part A SNF Care and Medicare Hospice?

Be careful with this tricky scenario.

What requirements does a SNF have to follow to skill a resident under Part A who is receiving Medicare hospice care in the facility?

Answer: A person can be in a Medicare Part A SNF stay and hospice if the person's Part A stay is unrelated to his terminal illness, says **Beth Carpenter**, president of **Beth Carpenter and Associates** in Lake Barrington, Ill. But the hospice, including its medical director, and the SNF should have "a clear and documented discussion" as to whether the SNF condition is related to the terminal illness or not, Carpenter emphasizes.

Don't make this mistake: Some providers think that as long as the reason for the Medicare Part A stay and hospice involve different diagnoses, they can provide both, says **Cherry Meier**, VP of public affairs for **VITAS Innovative Hospice Care** in Flat Rock, N.C. But the rules say the reason for the Part A stay can't be related to the patient's terminal illness, she emphasizes.

Meier, in fact, predicts that once Medicare Administrative Contractors (MACs) get going, they will be able to detect instances where both the SNF and hospice are billing for the same patient. "And we'll see a potential crackdown on that issue."

What would be totally unrelated? Fall-related injuries are the most common example, says Meier. But even there, you have to be careful because someone might fall due to a pathologi-

cal fracture from a metastatic lesion in the bone, she adds; or he might fall due to cancer-related weakness and frailty. Medical reviewers may also argue that the drugs used to palliate the cancer could weaken bones, says Carpenter. But if the person truly has an accident -- and the person's terminal illness wasn't a contributory factor -- that might qualify as an example, Meier notes. Another example might be someone with a terminal cancer diagnosis who requires Part A SNF care after a myocardial infarction where the person had a history of MIs, she adds.