

## **OASIS Alert**

## **OASIS News: Providers Await M0175 Updates**

With millions of dollars at stake, providers want proposed M0175 recoupments to disappear, but so far all that has disappeared are updates.

The **Centers for Medicare & Medicaid Services** had planned to take back overpayments caused by incorrect answers to M0175 (Discharge from an inpatient facility during the past 14 days) during the first years of the prospective payment system (see OASIS Alert, Vol. 7, No. 5 for more M0175 details).

But the **National Association for Home Care & Hospice** questioned CMS' compliance in their recoupment plan with section 935 of the Medicare Modernization Act. MMA 935 requires CMS to delay recovery of overpayments until the second level of Medicare appeals.

At last report, CMS had no timetable for resuming overpayment recovery. "There are no M0175 updates at this time," regional home health intermediary **Palmetto GBA** stated in its June 5 response to questions from its "16-State Coalition."

Recoupments have not started yet and "there is no final schedule of when they will start," a CMS spokesperson tells Eli.

• Regional home health intermediary Palmetto GBA recently revised and updated its Home Health Training Manual. One of the changes noted in its June 5 question and answer set is how to handle situations when a patient is either in the hospital or being discharged from the hospital on episode days 60 and 61.

Other updates concern the requirements for a valid stamped physician signature, how to code sunburns and instructions for using V codes and manifestation codes. The FAQs are at <a href="https://www.palmettogba.com">www.palmettogba.com</a>. Select "regional home health and hospice intermediary," then "FAQs," then "16 state ... meeting FAQs."

- **Don't look for ICD-9-CM code 731.3** (Major osseous defects) on your list of prospective payment system case mix codes. Despite the fact that category 731 is on the current case mix list, 731.3 is not a case mix diagnosis, directs CMS contractor **Abt Associates**.
- **CMS postponed the scheduled** September 26 Home Health, Hospice & Durable Medical Equipment Open Door Forum until October. At press time, CMS had not announced a new date, but expected it to be mid- to late October. More information will be at <a href="https://www.cms.hhs.gov/center/hha.asp">www.cms.hhs.gov/center/hha.asp</a>.