

OASIS Alert

OASIS News: RAP PAYMENT WORKAROUND AFFECTS SOME PROVIDERS

Intermediaries may not be paying, but you should keep filing.

Home health agencies paid through regional home health intermediary **Palmetto GBA** should expect confusion and cash flow delays, as RAP payments are delayed along with claims reimbursement in the nine-day hold on Medicare payments.

The problem: Medicare will not pay any claims from Sept. 22 through Sept. 30, in accordance with the Deficit Reduction Act of 2005, pushing about \$5 billion of Medicare payments from fiscal year 2006 into fiscal year 2007. Instead, intermediaries will pay these claims Oct. 2.

Requests for anticipated payments are non-claim payments and thus not authorized to be included in this cash flow crunch. However, Palmetto is the only RHHI that operates under the HIGLAS (Healthcare Integrated General Ledger Accounting System)--and the system doesn't distinguish RAP payments from final claim payments.

So Palmetto will apply the hold to RAPS as well, the **Centers for Medicare & Medicaid Services** confirms.

Palmetto is the RHHI for Alabama, Arkansas, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Mississippi, New Mexico, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee and Texas.

The solution: While unable to modify the HIGLAS system in time for the payment hold, CMS and the **National Association for Home Care & Hospice** devised a work-around. Agencies served by Palmetto that need RAP payments during the hold period--primarily when required to meet obligations or avoid financing charges, NAHC suggests--can contact Palmetto and request payments for RAPs that have been cleared through the normal process, but not yet paid. The RHHI will then issue a paper check to the HHA and ship it by express carrier for next day delivery, NAHC explains.

All agencies: Focus on submitting error free RAPs and claims to speed up payment. And continue your normal RAP and claims submission schedule to ensure prompt payment after Oct. 1, experts recommend.

- **CMS announces updated versions** of the HHA System User's Guide. Version 4.3 (up-dated June 2006) contains information on electronic data submission, pagination changes and a report search feature, CMS says.

Also updated is the HHA Error Message Guide. You can download a manual describing the types of reports and messages that result when you electronically submit OASIS data, CMS says. It is based on HAVEN 7.0. To download both of these updates, go to www.cms.hhs.gov/HomeHealthQualityInits/downloads/HHQIOASISChapters.zip

- **Be ready to implement coding changes Oct. 1.** Updated 2007 ICD-9-CM codes take effect with no grace period. The 2007 list of new codes includes 22 new neurological and one new orthopedic case mix diagnosis codes.

To do: Be sure you've obtained new 2007 coding manuals, updated any "cheat sheets" your staff uses, and educated all staff who will need to deal with the coding changes.

Identify current patients who have one of the changed diagnostic codes and be prepared to update the code on the next OASIS assessment or plan of care developed after Oct. 1, recommends Chapel Hill, NC consultant **Judy Adams with LarsonAllen.**

Note: Look for more coding information in Eli's Home Health ICD-9 Alert monthly newsletter, available at

www.elihealthcare.com or by calling 1-800-874-9180. For a complete discussion of new coding changes, order CDs, tapes or transcripts of Judy Adams' recent Eli Research-sponsored teleconference, "2007 ICD-9 Coding Update for Home Health" at <http://codinginstitute.com/conference/tapes.cgi?detail=642> or by calling 1-800-508-2582.

- **September 1 has come and gone, so you'd better know** how your home health advance beneficiary notices work. A 56-page document containing CMS' instructions is available for downloading at www.cms.hhs.gov/Transmittals/2006Trans/list.asp.

[Download the HHABN forms in English or Spanish at www.cms.hhs.gov/BNI/](http://www.cms.hhs.gov/BNI/). To access forms and directions, click on the dedicated link at the top left margin: FFS HHABN.

Questions: [If you have questions about the HHABN, contact your regional home health intermediary, CMS directs. For more extensive discussion and tips on using HHABNs correctly, order Eli's Home Care Week at www.elihealthcare.com or by calling 1-800-874-9180.](#)

- **Say goodbye to Mark McClellan** as CMS administrator. McClellan, a physician, announced his resignation on Sept. 6 after just two years in the job. McClellan has been a strong supporter of pay for performance and quality improvement.