

OASIS Alert

Survey & Certification: DON'T GET BURNED BY NEW HOME HEALTH ABNs

Feds postpone June 1 start date.

Agencies now have a few extra months to decipher ABNs.

Opportunity: The home health advance beneficiary notices were originally scheduled to take effect June 1, but a last minute postponement announced during the May 24 HH Open Door Forum tentatively moves the date to Sept. 1.

The **Center for Medicare & Medicaid Services** has decided to "extend the period of dual use of the old and revised HHABN," CMS official **Elizabeth Carmody** announced. "We are considering ex-tending this period to Sept. 1 and will confirm this date later," she explained.

Agencies can expect written confirmation of the postponement "in the next day," Carmody added.

So far during the public comment period, CMS has received "about 150 comments." Agencies can expect some changes to the HHABN instructions to reflect the comments, Carmody said.

The final version of the HHABN preliminary instructions is pending while CMS considers the comments it has received, she explained.

Refer To The Growing Body of Questions and Clarifications

CMS previously issued 25 new questions and answers to clarify the mysteries of the new home health ABNs, but you may find yourself even more mystified.

Surprise 1: You are expected to provide the patient with an ABN if service reductions occur at the time of recertification, even though that is a new episode with new doctor's orders.

Surprise 2: You are required to use ABN notices for reductions in non-Medicare-covered services such as telehealth and nutrition.

As questions from home health agencies keep pouring in, CMS plans to publish a new set of HHABN Q&As by the first week of June, Carmody announced in the forum. There may be further sets of Q&As and perhaps an ODF specifically for HHABNs, she added.

Note: ABN information, including forms and current instructions, is at www.cms.hhs.gov/BNI/03_HHABN.asp. For detailed explanations and the latest clarifications, order Eli's Home Care Week at www.elihealthcare.com or by calling 1-800-874-9180.