

Health Information Compliance Alert

Home Health Compliance: Know When To Use The Replacement ABN

Your HHABN may still apply into 2014.

Just because the Centers for Medicare & Medicaid Services (CMS) has done away with the HHABN doesn't mean you'll wash your hands of Advance Beneficiary Notices altogether.

"ABNs have been required to inform beneficiaries in Original Medicare about possible non-covered charges when limitation of liability applies," CMS explains in Sept. 6 CR 8404. "The Home Health Advance Beneficiary Notice (HHABN), Form CMS-R-296 is being discontinued, and [HHAs] will now use the ABN for liability notification."

"The general ABN will be used for decreases when they are due to coverage or eligibility requirements," explains Judy Adams with Adams Home Care Consulting in Asheville, N.C. "It is essentially the same as the HHABN form and should be a wash," Adams tells Eli.

Tip: You don't have to reissue the ABNs you use annually when the forms switch over, CMS allows. "HHABNs issued prior to December 9, 2013 for ongoing, repetitive services will remain in effect for the time period indicated on the notice, up to one calendar year from the date of issuance," the agency explains on its website. "Please note that, like the HHABN, the ABN is effective for up to one year and must be issued annually for ongoing, repetitive services when notice is required."

Note: The ABN CR is at www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/Downloads/R2782CP.pdf and a related MLN Matters article is at www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM8404.pdf. You can download the form at www.cms.gov/Medicare/Medicare-General-Information/BNI/HHABN.html.