

The Least You Need to Know:

CMS entities have resumed audits for hospice agencies, after a pause during the PHE. CMS has historically performed pre-pay and post pay reviews to ensure proper payment and billing of hospice claims. These reviews are done by a variety of CMS contractors, who have resumed audits once again.

How does this affect your hospice?

MACs

The Medicare Administrative Contractor (MAC)s have shifted from the Pre-Pay Targeted Probe and Educate, which focused on specific hospice providers, to a post pay review of hospice claims, focused on topics, such as GIP or length of stay. These audits are for dates of service January 2019- February 2020. The MAC may not request any claims from some providers, or may request up to 20 for some providers, based on the topic.

RACs

No direct hospice topics are currently being audited. There are several audits on other Medicare providers, looking at the unbundling of the hospice benefit, including DME and outpatient care.

SMRC

There are three hospice topics that continue to be reviewed. Two topics are in regards to the use of GIP, and the third is related to routine and continuous care in an assisted living.

CERT

Reviewing a random sample for their Reporting Year (RY) 2021 (claims submitted 7/1/2019 through 6/30/2020) and RY 2022 (claims submitted 7/1/2020 through 6/30/2021).

Actions of a Prudent Hospice™

ONE. Know who could audit you, in your state. You can see all CMS contractors in your state here: <https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/Review-Contractor-Directory-Interactive-Map> by clicking on your state.

TWO. Know the conditions for payment. Perform a “Triple check” on these technical and medical necessity components of your documentation.

THREE. Have a process in place for any ADR where one of these contractors requests your documentation. Know who will print, how the documents will be arranged, who will review from a clinical perspective, and who is responsible to upload/mail in a timely fashion. Be sure to track all ADRs for timeframes to ensure your ability to appeal when necessary.

Links to More Information

MACs:

www.palmettogba.com

www.ngsmedicare.com

www.cgsmedicare.com

RAC:

<https://www.performantcorp.com/solutions/healthcare/cms-rac-resources/region-5/default.aspx>

SMRC:

<https://www.noridiansmrc.com/>

UPIC:

<https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/Review-Contractor-Directory-Interactive-Map>

CERT:

<https://certprovider.admedcorp.com/>

