Mitigating Hot Button Risk Areas in Home Health & Hospice

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Agenda

• What are the risk areas?
• How can you learn/prepare?
• Resources and tools
• Next steps

Home Health/Hospice Risk Areas

Who defines risk areas, and how are they looking at them?
– CMS
– Office of Inspector General
– Medicare contractors
– Others: MedPAC, CERT, law enforcement
HH/Hospice Improper Payments

- Comprehensive Error Rate Testing (CERT)
- Available at CMS.HHS.gov/CERT
- 2016 HH: 42.0%, $7.65B projected (down from 59%, $10B projected)
- 2016 Non-hospital based Hospice: 14.6%, $2.13B projected (up from 10.7%, $1.4B)
- 2016 Hospital-based Hospice: 31.0%, $390M projected (up from 18.9, $250M)

Home Health Risk Areas

- Pre-claim review demonstration
- Probe & educate
- Conditions of participation
- Quality
- Medical necessity
- Certification/recertification
- OASIS assessments
- Code changes

Hospice Risk Areas

- Notices of election, of termination/revocation
- Election
- Quality
- Length of stay
- Levels of care
- Live discharges
- Place of care/site of service
- Services provided last days of life
Future Risk Areas?

• Quality measures
• Outcomes
• Patient surveys
• Physician involvement
• Safety

What’s a Provider to Do?

• OIG Work Plan
• CMS listserv
• Contractor websites and listservs
  – Local coverage determinations
  – Denial codes
• CERT annual report

Comparative Data

• PEPPER
• Public Use File (PUF) data
• Quality reports
• HH Compare
Available for Home Health Agencies, Hospices
Summarizes Medicare claims data for areas at risk for improper Medicare payments
Cannot identify improper payments.....
How to use it?

Risk Areas Included in PEPPER

Home Health:
- Average Case Mix
- Average Number of Episodes
- Episodes w/ 5 or 6 Visits
- NonLUPA Payments
- High Therapy Utilization Episodes
- Outlier Payments

Hospice:
- Live Discharges
- Live Discharges Revocations
- Live Discharges LOS 61-179
- Long Length of Stay (>180 days)
- CHC in ALF
- RHC in ALF
- RHC in NF
- RHC in SNF
- Single Diagnosis Coded
- No GIP or CHC
- Long GIP Stays
Comparing Hospice PEPPER Target Areas

Public Use Files

- Publicly-available via CMS website
- CY2014 most recent currently available
- Anticipate updated annually
- Use as a validation data source
HH PUF Elements

- Total Episodes (non-LUPA)
- Distinct Benes (non-LUPA)
- Avg # of Total Visits per Episode (non-LUPA)
- Avg # of Skilled Nsg Visits per Episode (non-LUPA)
- Avg # of PT Visits per Episode (non-LUPA)
- Avg # of OT Visits per Episode (non-LUPA)
- Avg # of ST Visits per Episode (non-LUPA)
- Avg # of Home Health Aide Visits per Episode (non-LUPA)
- Avg # of Med-Soc Visits per Episode (non-LUPA)
- Total HHA Charge Amt (non-LUPA)
- Total HHA Medicare Pmt Amt (non-LUPA)
- Total HHA Medicare Standard Pmt Amt (non-LUPA)
- Asian/Pacific Islander Benes
- Hispanic Benes
- African American Benes
- White Benes
- Other/Unknown Race Benes
- Male Benes
- Female Benes
- Total Episodes
- Distinct Benes

Hospice PUF Elements

- Hospice Benes
- Total Days
- Total Medicare Pmt Amt
- Total Medicare Standard Pmt Amt
- Total Charge Amt
- Percent Routine Home Care Days
- Percent Home Health Aide Days
- Percent Skilled Nursing Days
- Percent Social Services Days
- Total Live Discharges
- Hospice Benes with 7 or fewer hospice care days
- Hospice Benes with more than 30 hospice care days
- Hospice Benes with more than 90 hospice care days
- Hospice Benes with a stay of over 100 days
- Hospice Benes with a stay of over 120 days
- Hospice Benes with a stay of over 180 days
- Hospice Benes with Medicare

Quality Reports

- Home Health Compare
  - Built on information from agencies and patients
- Hospice Compare – FY2019?
  - What will they use?
Audit Tools

• Palmetto Home Health Medical Review Audit Form
  – http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Home Health Medical Record Audit Form.pdf/$File/Home Health Medical Record Audit Form.pdf

Audit Tools, cont.

• Palmetto Hospice Documentation Audit Tool

• Palmetto Hospice GIP Audit Tool

Audit Tools, cont.

• NGS
  – ADR Checklist
  – Mock Chart Checklist
  – Suggestions

• CGS
  – Medical Review ADR Process
  – HH and Hospice

• Other job aids
Customizing Your Audit Tools

- Usual documentation reviews – focus on physician face-to-face, certifications, medical necessity
- Outcomes – does documentation support outcomes?
- Denials/Probe and Educate – analyze what you may need to audit

Customizing Your Audit Tools, cont.

- Use your data to develop further tools – PEPPER, PUF
- HH recerts and hospitalizations
- Quality ratings
- Individualize based on your agency’s risk assessment

Internal Steps/Actions

- Audit/Monitor medical record documentation
- Review your claims data
  - Payments, denials
  - Know your regional idiosyncrasies
- Know your agency’s risk
Internal Steps/Actions, cont.

- Training
  - Internal comprehensive/Ongoing
  - Take advantage of what’s out there
  - Questions re: policy/regulations/billing?
    - Contact your MAC
- Be ready for change
  - Follow regulatory talk/trends/final rule

Responding to Auditors

- Be aware of your data/auditing/monitoring results
- Be prepared for “when,” not “if”
- Know your strengths, weaknesses
- Have subject-matter experts ready
- Educate all staff members

Conclusion

- Strive for excellence
- Stay alert for changing risk areas
- Be ready for unexpected hazards
Questions?

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• Kimberly Hrehor  kim.hrehor@tmf.org
• Help Desk at PEPPERResources.org

Resources

• Open Door Forum  https://www.cms.gov/Open-Door-Forum
• CMS Internal Only Manuals (DOM)  https://www.cms.gov/Provider-Handbooks/Downloads/In-Only-Manuals.html
• 100-3 Medicare Benefit Policy Manual, Chapter 7 for HH, Chapter 9 for Hospice and 100-4 Medicare Claims Processing Manual, Chapter 10 for HH, Chapter 11 for Hospice and 100-8 Medicare Program Integrity Manual, Chapter 6
• Medicare Coverage Database (to access MAC LCDs and supplemental articles):  https://www.cms.gov/medicare-coverage-database
• MAC Jurisdiction 15 CGS http://www.cgsmedicare.com/medicare_dynamic/ls/001.asp
• MAC Jurisdiction M Palmetto http://www.palmettogba.com/registration.nsf/Push+Mail+Archive/Item?OpenForm
• PEPPER email box: "Ten News" at  https://pepperresources.org
• McKnight's Newsletters  http://www.mcknights.com/newsletters/

Resources, cont.

• Open Door Forum  https://www.cms.gov/Open-Door-Forum
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• 100-3 Medicare Benefit Policy Manual, Chapter 7 for HH, Chapter 9 for Hospice and 100-4 Medicare Claims Processing Manual, Chapter 10 for HH, Chapter 11 for Hospice and 100-8 Medicare Program Integrity Manual, Chapter 6
• Medicare Coverage Database (to access MAC LCDs and supplemental articles):  https://www.cms.gov/medicare-coverage-database
• MAC Jurisdiction 15 CGS http://www.cgsmedicare.com/medicare_dynamic/ls/001.asp
• MAC Jurisdiction M Palmetto http://www.palmettogba.com/registration.nsf/Push+Mail+Archive/Item?OpenForm
• PEPPER email box: "Ten News" at  https://pepperresources.org
• McKnight's Newsletters  http://www.mcknights.com/newsletters/