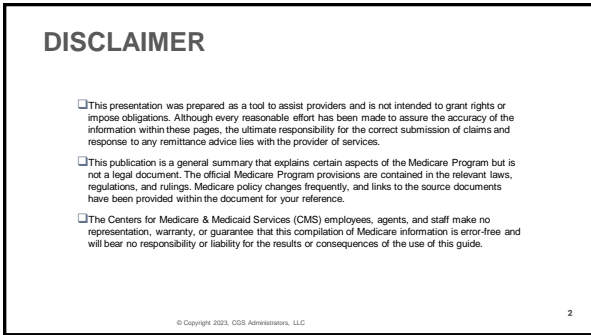




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Are You Using the myCGS Portal?

Click here to learn more

Click here for J16 A/B/HH/MAC

myCGS
ALBANY MAC
ADMINISTRATIVE

Welcome to myCGS!
Log In to J16 A/B/HH/MAC myCGS

myCGS Capabilities
myCGS gives you access to claim status, beneficiary eligibility, claim administration, payment information, enrollment information and much more.

Enjoy the convenience and time-saving benefits of myCGS.

Who Can Register for myCGS?
Jurisdiction: 15 ABB1491 MAC providers and billing companies.

Need Help? Give Us a Call!
Part A: 1-800-540-0134 x12288
Part B: 1-800-276-9526

Need Assistance?
 - Forget Your Password? → CGS Administrators, LLC
 - Log In Help → Log In to myCGS Video
 - Looking for Another Website? → Centers for Medicare & Medicaid Services (CMS)
 - myCGS Manual

CGS **CMS**
A Division of CGS Companies

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<https://www.cgamecare.com/mycgs/index.html>

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FY2024 Hospice Final Rule

[CMS-1787-F | CMS](#)

CMS-1787-F

Registration No: 096-000-7

Title: FY2024 Hospice Rule and Hospice Data System and Hospice Quality Reporting Requirements

Display Date: 2023-07-18

Publication Date: 2023-08-02

The final rule and an update of the Office of the Federal Register (OFR) request to look at Thursday, July 26, 2023 and will be available on the website and published in the Federal Register, August 3, 2023. See CMS-1787-F for "Hospice Care" search history.

Downloads
[CMS-1787-F.pdf](#)

Related Links
[CMS-1787-F.pdf](#)
[CMS-1787-F.pdf](#)

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Medicare Hospice Payment Policies

- "Finalizing regulations' text changes related to the provision of telehealth services for Routine Home Care with the expiration of the COVID-19 PHE and for the use of telecommunications technology for the face-to-face encounter conducted by a hospice physician or hospice nurse practitioner for the sole purpose of hospice recertification through December 31, 2024."

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FY 2024 Routine Annual Rate Setting Changes

- "The FY 2024 hospice payment update percentage is 3.1% (an estimated increase of \$780 million in payments from FY 2023)."
- "The hospice cap amount for FY 2024 is \$33,494.01, which is equal to the FY 2023 cap amount (\$32,486.92), updated by the FY 2024 hospice payment update percentage of 3.1%."

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Hospice Quality Reporting Program

- "CMS codified the HQRP data completion threshold policy at §418.312 and provided several updates relative to the development of a patient assessment instrument, titled HOPE, and future quality measures."

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Hospice Certifying Physician Enrollment

In response to concerns raised by commenters, we will not implement or enforce this requirement until May 1, 2024, to give unenrolled and non-opted-out physicians more time to enroll in or opt-out of the Medicare program.

- "Under our existing regulations, (1) the hospice medical director or the physician member of the hospice interdisciplinary group (hereafter the "hospice physician") and (2) the attending physician (if the beneficiary has one) must initially certify the patient's terminal condition. (For subsequent periods, only the hospice physician must do so.) As part of CMS' larger strategy to address hospice program integrity and quality of care, and under our authority under section 6405 of the Affordable Care Act, we are finalizing our proposal that these two categories of physicians must be enrolled in or opted out of Medicare for hospice services to be paid. Requiring enrollment or opt-out will allow us to screen the physician to ensure they are qualified (e.g., licensed) to certify the terminal condition."

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**CGS Billing Errors – Hospice- Missouri
9/2022 – 7/2023**

Reason Code	Billing Error	# of Errors
37402	Hospice sequential billing error	3,942
38200	Duplicate claim	3,121
31689	Medicare Secondary Payer (MSP) claim issue w/ paid amount	2,795
U5106	NOE falls within current hospice election	1,956
U5181	Occ od 27 required when certification date falls w/in DOS	1,664


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**TOP CLAIM SUBMISSION ERRORS
WEBPAGE**

Hospice Top CBE's	Short Narrative
37402	Hospice sequential billing error
38200	Duplicate claims
U5106	NOE falls within current hospice election
U5181	Occurrence code 27 required when certification date falls within dates of service
34692	Service facility NPI not included
U523A	The dates of service on this claim are during both a Hospice election period and Medicare Advantage Plan Period that is Value Based Insurance Design (VBID) Model. No resolution is required by providers. Refer to the U523A Reason Code Search and Resolution information for details.
39679	The hospice claim was rejected due to an untimely Notice of Election (NOE)
U5184	Hospice claim received for untimely NOE & occurrence span code 77 is missing or invalid
31605	The dates of services on the claim cannot be within the span code 77 dates unless the charges are non-covered
31903	The total units on the level of care lines (0051, 0052, 0055, 0056) do not equal the number of days in the billing period.

Reason Code Search and Resolution
For information about other reason codes, refer to the Reason Code Search and Resolution Web page. Note that this resource does not include a complete list of reason codes, just the most frequent.

 <https://www.cgsmedicare.com/hhh/education/materials/cs/es.html>

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CGS HH&H Web page
<http://www.cgsmedicare.com/hhh/index.html>

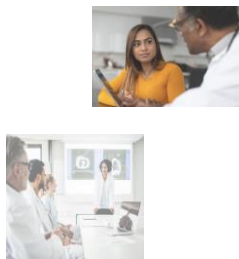


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OBJECTIVES

- Define Targeted Probe & Educate (TPE)
- Review the TPE Process
- Provide Resources and CMS guidelines to Facilitate Appropriate Reimbursement



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WHAT IS TARGETED PROBE & EDUCATE (TPE)?

TPE Defined:

- Targeted Probe** – Focus on specific providers that bill a particular item or service deemed a 'risk' or 'variance' by data analysis
- Educate** – Targeted probe findings given as individualized reviews and one-on-one education from MACs to providers

TPE Intent:
Collaborative approach to reduce claim denials and appeals by increasing knowledge and improving accuracy

GOAL: Help providers quickly improve and prevent denials




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TPE PROCESS - SELECTION

TPE Selection Edits
Data Analysis

- New Providers
- High Claim Denial Rates
- Significant Variance in Billing Practices from Peers
- Error Rate Results



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TPE PROCESS - REVIEW

TPE Review Process
Round One

- Review of 20-40 claims per provider/supplier, per item or service
- Required Additional Documentation Requests (ADRs)
- Error Rate Determined
 - No response to ADRs counts as an error when calculating the error rate

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WHAT IS AN MR ADR?

CGS Home Health and Hospice Medical Review Web page
<https://www.cgsmedicare.com/hhh/medreview/index.html>

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Additional Documentation Requests

Length: 2:30

Course Summary: If a claim is selected for medical review, your Medicare Administrative Contractor (MAC) will request additional documentation from you to ensure payment is appropriate. When this happens, the medical review department at CGS will issue you an additional document request (ADR) with information it needs to continue processing the claim. In this video, you will learn the fundamentals of responding to an ADR, including ways to check for ADRs and tips for responding on time.

Date Recorded: 03/17/23

[Additional Documentation Requests - YouTube](#)

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TPE HOSPICE DENIAL PREVENTION

6-month Terminal Prognosis

Chronic vs Terminal

Chronically Ill

- Slowly declining disease process
- May require assistance with activities of daily living
- Can live several years as their body fails

Terminally Ill

- Disease progression significantly declining
- Trajectory of progression provides prognosis of a life expectancy of less than six months

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TPE HOSPICE DENIAL PREVENTION

6-month Terminal Prognosis

Documentation

- Be specific to that individual patient
- Document what distinguishes the patient as terminal and not chronic
- Have narrative notes to explain information noted on a checklist - use comment sections
- Distinguish between exacerbation with stabilization and exacerbation with deterioration
- Compare current to previous
- Exacerbation and resulting decline/deterioration
- Purpose and need for aggressive palliative treatments

Documentation Opportunities:

- Appears to be losing weight
- Ate 50% of meal
- Shows "slow decline"
- "Stable"
- "Eating well"

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TPE HOSPICE DENIAL PREVENTION

6-month Terminal Prognosis

Nursing Documentation

Typical Nursing Documentation

- Focus on identification of issues, creation of care plans based on findings and implementation of interventions and treatment plans in an effort to optimize health and achieve goals

Hospice Nursing Documentation

- Focus on patient deterioration and decline
- Good objective data
- Must support CTI that the patient has a life expectancy <6 months

Documentation Opportunities:

- Appears to be losing weight
- Ate 50% of meal
- Shows "slow decline"
- "Stable"
- "Eating well"

Strong Documentation:

- Weight 142 lbs from 152 lbs at admission
- Intake variable, from 25-75% of meals
- Increased dyspnea/pain over past 2 weeks - now oxygen dependent 2L NC

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Part I. Decline in Clinical Status Guidelines

Part II. Non-Disease Specific Baseline Guidelines

Part III. Co-Morbidities

Disease Specific Guidelines

HOSPICE DETERMINING TERMINAL STATUS LOCAL COVERAGE DETERMINATION (LCD)

- CGS Home Health and Hospice Medical Policies Web page <https://www.cgsmedicare.com/hhh/coverage/index.html>
- CGS Hospice Quick Resource Tools Web page https://www.cgsmedicare.com/hhh/education/materials/hospice_qrt.html

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Hospice Determining Terminal Status Local Coverage Determination (LCD) – Part One

Part 1: Decline in Clinical Status

- Clinical Status
- Signs
- Symptoms
- Lab Tests
- Decline in KPS or PPS
- ADLs
- FAST
- Increasing ER Visits
- Ulcers

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Hospice Determining Terminal Status Local Coverage Determination (LCD) – Part Two

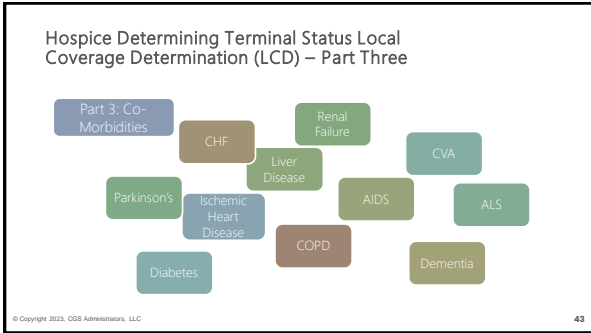
Part 2: Non-Disease Specific Baseline Guidelines

- Physiologic impairment of functional status as demonstrated by KPS or PPS <70%
- Patient depends on assistance for two or more ADLs

Disease-specific guidelines can be used in conjunction with non-disease-specific guidelines.

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- ### Common End of Life Symptoms
- ▀ Pain
 - ▀ Nausea / Vomiting
 - ▀ Anxiety and Depression
 - ▀ Constipation and Diarrhea
 - ▀ Insomnia
 - ▀ Agitation, Psychosis, Delirium
 - ▀ Fluid Retention
 - ▀ Appetite Loss
 - ▀ Infections
 - ▀ Oral / Pharyngeal Secretions
 - ▀ Fatigue
 - ▀ Dyspnea
 - ▀ Wounds & Decubitus Ulcers
 - ▀ Dyspepsia
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- ### Assessment Information to Support a Terminal Prognosis
- ▀ Vital Signs and Measurements
 - ▀ Respirations, blood pressure, pulse, temperature, pain, O2 saturation
 - ▀ Weight, L/R MAC, Abdominal Girth
 - ▀ Intake/Output
 - ▀ KPS/PPS/FAST/NYHA
 - Graphs easily illustrate change
 - ▀ Skin Integrity
 - ▀ Stage 3 or 4 pressure ulcers
 - ▀ Increase ADL dependence
 - ▀ Feeding
 - ▀ Ambulation
 - ▀ Continence
 - ▀ Transfer
 - ▀ Bathing
 - ▀ Dressing
 - ▀ Recurrent/intractable Infection(s)
 - ▀ Pneumonia
 - ▀ Sepsis
 - ▀ Pyelonephritis or other upper urinary tract infection
 - ▀ Fever, recurrent after antibiotics
 - ▀ Changes to plan of care
 - ▀ Medication adjustments
 - ▀ Lab results (when available)
 - ▀ Arterial blood gases/pulse oximetry
 - ▀ CBC
 - ▀ Electrolyte balance
 - ▀ Metabolic studies
 - ▀ Prealbumin, albumin or cholesterol
 - ▀ Tumor markers
 - ▀ Lucidity and Responsiveness
 - ▀ Agitation
 - ▀ Level of consciousness
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General Inpatient Care (GIP)

Beneficiary's medical condition warrants a short-term inpatient stay for pain control or symptom management that **cannot feasibly be provided in other settings**

- Medication adjustment, observation, treatment to stabilize patient
- Intensity of care that cannot feasibly be managed in any other setting
- Services must conform with the written plan of care
- May only be provided in Medicare participating facilities
 - Hospital
 - Skilled nursing facility (SNF)
 - Hospice inpatient facility

Upon transfer to GIP level of care documentation should include both:

- A precipitating event (onset of uncontrolled symptoms or pain)
- The interventions tried in the home that have been unsuccessful at controlling the symptoms

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Documenting the Need for GIP Care

Symptom Changes

- Uncontrolled pain
- Sudden deterioration
- Uncontrolled nausea and/or vomiting
- Pathological fractures
- Unmanageable respiratory distress
- Frequent, skilled wound care
- New or increased delirium and/or agitation

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Documenting the Need for GIP Care

Pain Control

- Requiring skills of a nurse (including teaching)
- Frequent evaluation
- Frequent medication adjustment
- Aggressive treatment to control pain

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Documenting the Need for GIP Care

Other Reasons

- Medication adjustment
- Observation
- Stabilizing treatment
- Psycho-social monitoring

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POTENTIAL ISSUES WITH GIP DOCUMENTATION

Long stays

Inappropriate use

No discharge planning

Documentation not supporting GIP level of care

Location does NOT determine level of care

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Inappropriate Use of GIP Care

- For routine admission and care plan formation
- Ongoing assessment of managed symptoms
- No available caregiver for in-home care/caregiver relief
- General fall risk and/or supervision need
- A patient in the dying process does NOT make the patient eligible
- An inpatient unit is NOT an automatic step down from the hospital

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