



Mitigating Hot Button Risk Areas in Home Health & Hospice

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HCCA Compliance Institute
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Agenda

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

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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

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HH/Hospice Improper Payments

- Comprehensive Error Rate Testing (CERT)
- Available at [CMS.HHS.gov/CERT](https://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)

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Home Health Risk Areas

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

**What's
HOT?**

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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

**HOT
BUTTON**

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Future Risk Areas?

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



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What's a Provider to Do?



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

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Comparative Data

- PEPPER
- Public Use File (PUF) data
- Quality reports
- HH Compare



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Program for Evaluating Payment
Patterns Electronic Report

- 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?

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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

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Home Health Agency PEPPER

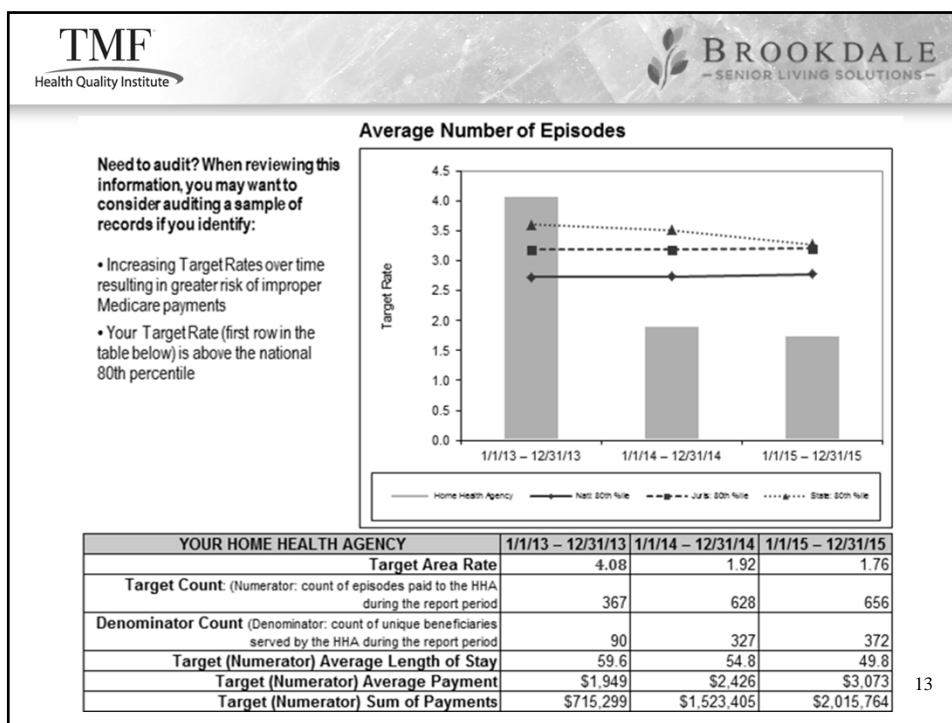
[Visit PEPPERresources.org](http://VisitPEPPERresources.org)

Compare Targets Report, Four Quarters Ending Q4 CY 2015

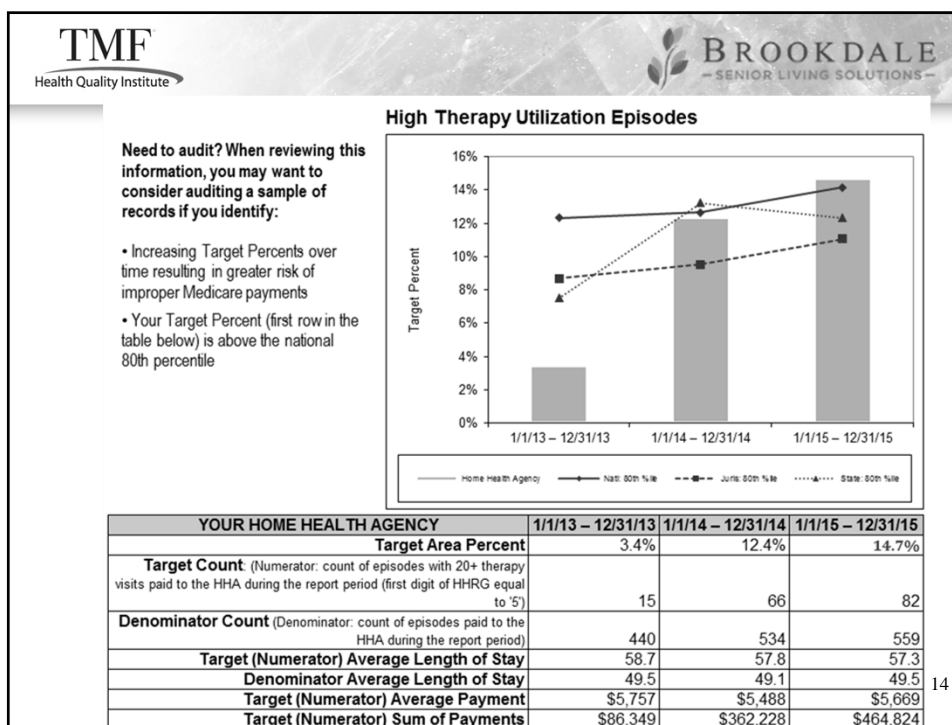
002271, Provider D02271

Target	Description	Target Count/ Amount	Percent/ Rate	Home Health Agency National %ile	Home Health Agency Jurisdict. %ile	Home Health Agency State %ile	Sum of Payments
Average Case Mix	Proportion of the sum of case mix weight for all episodes paid to the HHA during the report period, excluding LUPAs and PEPs, to the count of episodes paid to the HHA during the report period, excluding LUPAs and PEPs	639	1.22	86.6	95.5	92.0	Not Calculated
Average Number of Episodes	Proportion of the count of episodes paid to the HHA during the report period, to the count of unique beneficiaries served by the HHA during the report period	559	1.56	38.2	53.2	80.0	\$1,852,613
Episodes with 5 or 6 Visits	Proportion of the count of episodes with 5 or 6 visits paid to the HHA during the report period, to the count of episodes paid to the HHA during the report period	23	4.1%	14.1	7.2	4.3	\$39,765
Non-LUPA Payments	Proportion of the count of episodes paid to the HHA that did not have a LUPA payment during the report period, to the count of episodes paid to the HHA during the report period	532	95.2%	60.9	78.8	88.0	\$1,843,013
High Therapy Utilization Episodes	Proportion of the count of episodes with 20+ therapy visits paid to the HHA during the report period (first digit of HHRG equal to '5'), to the count of episodes paid to the HHA during the report period	82	14.7%	81.5	91.8	89.5	\$464,824
Outlier Payments	Proportion of the dollar amount of outlier payments for episodes paid to the HHA	\$8,011	0.4%	16.2	11.4		Not Calculated

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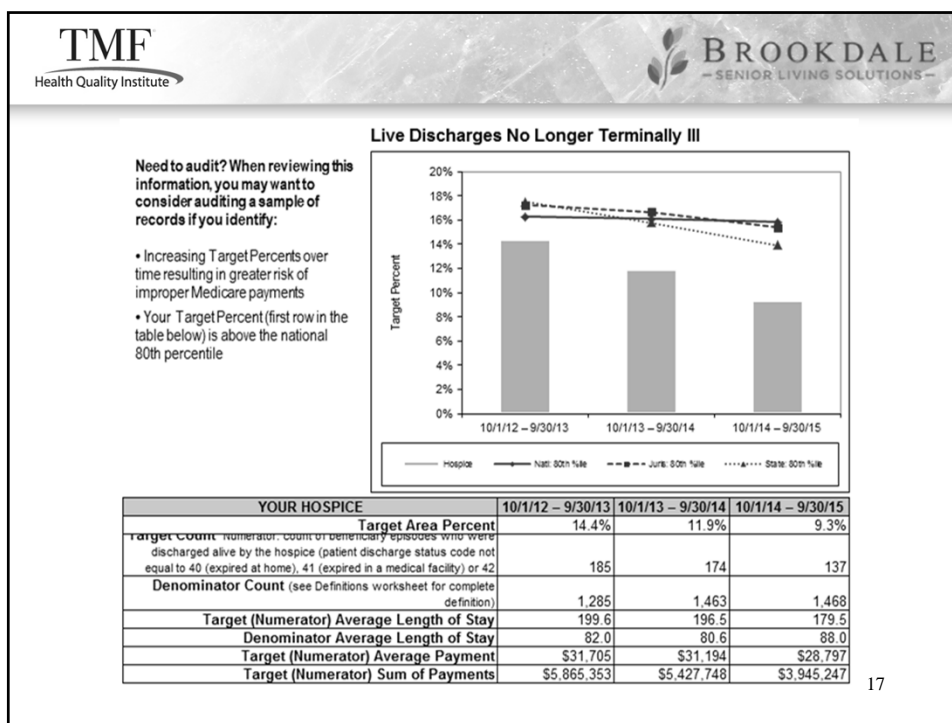



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Public Use Files

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

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HH PUF Elements

- | | |
|---|--|
| • Total Episodes (non-LUPA) | • White Benes |
| • Distinct Benes (non-LUPA) | • Black Benes |
| • Avg Nbr of Total Visits / Episode (non-LUPA) | • Asian Pacific Islander Benes |
| • Avg Nbr of Skilled Nsg Visits / Episode (non-LUPA) | • Hispanic Benes |
| • Avg Nbr of PT Visits / Episode (non-LUPA) | • Am Indian or Alaska Native Benes |
| • Avg Nbr of OT Visits / Episode (non-LUPA) | • Other/ Unknown Benes |
| • Avg Nbr of ST Visits / Episode (non-LUPA) | • Avg HCC Score |
| • Avg Nbr of Home Health Aide Visits / Episode (non-LUPA) | • % of Benes with Atrial Fibrillation |
| • Avg Nbr of Med-Soc Visits / Episode (non-LUPA) | • % of Benes with Alzheimer's |
| • Total HHA Charge Amt (non-LUPA) | • % of Benes with Asthma |
| • Total HHA Medicare Pmt Amt (non-LUPA) | • % of Benes with Cancer |
| • Total HHA Medicare Standard Pmt Amt (non-LUPA) | • % of Benes with CHF |
| • Outlier Pmts as a % of Medicare Pmt Amt (non-LUPA) | • % of Benes with Chronic Kidney Disease |
| • Total LUPA Episodes | • % of Benes with COPD |
| • Total HHA Medicare Pmt Amt for LUPAs | • % of Benes with Depression |
| • Avg Age | • % of Benes with Diabetes |
| • Male Benes | • % of Benes with Hy/lipidemia |
| • Female Benes | • % of Benes with Hy/tension |
| • Nondual Benes | • % of Benes with IHD |
| • Dual Benes | • % of Benes with Osteoporosis |
| | • % of Benes with RA/OA |
| | • % of Benes with Schizophrenia |
| | • % of Benes with Stroke |

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Hospice PUF Elements

- | | |
|---|--|
| • Hospice benes | • Asian hospice benes |
| • Total Days | • Hispanic hospice benes |
| • Total Medicare Pmt Amt | • Other/unknown race hospice benes |
| • Total Medicare Standard Pmt Amt | • Medicare Advantage hospice benes |
| • Total Charge Amt | • Medicaid Eligible hospice benes |
| • Percent Routine Home Care Days | • Hospice benes with a pdx of cancer |
| • Physician Services | • Hospice benes with a pdx of dementia |
| • Home Health Visit Hours / Day | • Hospice benes with a pdx of stroke |
| • Skilled Nsg Visit Hours / Day | • Hospice benes with a pdx of circulatory/heart disease |
| • Social Service Visit Hours / Day | • Hospice benes with a pdx of respiratory disease |
| • Total Live Discharges | • Hospice benes with other primary diagnoses |
| • Hospice benes with 7 or fewer hospice care days | • Site-of-service - Home hospice benes |
| • Hospice benes with more than 60 hospice care days | • Site-of-service - Assisted Living Facility hospice benes |
| • Hospice benes with more than 180 hospice care days | • Site-of-service - Long-term-care or non-skilled Nsg Facility hospice benes |
| • Home Health Visit Hours / Day During Week Prior to Death | • Site-of-service - Skilled Nsg Facility hospice benes |
| • Skilled Nsg Visit Hours / Day During Week Prior to Death | • Site-of-service - Inpatient Hospital hospice benes |
| • Social Service Visit Hours / Day During Week Prior to Death | • Site-of-service - Inpatient Hospice hospice bene |
| • Average Age | • Site-of-service - Other Facility hospice benes |
| • Male hospice benes | |
| • Female hospice benes | |
| • White hospice benes | |
| • Black hospice benes | |

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Quality Reports

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



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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](http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Home_Health_Medical_Record_Audit_Form.pdf/$File/Home_Health_Medical_Record_Audit_Form.pdf)

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Audit Tools, cont.

- Palmetto Hospice Documentation Audit Tool
 - [http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Hospice_Documentation_Audit_Tool.pdf/\\$File/Hospice_Documentation_Audit_Tool.pdf](http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Hospice_Documentation_Audit_Tool.pdf/$File/Hospice_Documentation_Audit_Tool.pdf)
- Palmetto Hospice GIP Audit Tool
 - [http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Hospice_GIP_Audit_Tool.pdf/\\$File/Hospice_GIP_Audit_Tool.pdf](http://www.palmettogba.com/Palmetto/Providers.Nsf/files/Hospice_GIP_Audit_Tool.pdf/$File/Hospice_GIP_Audit_Tool.pdf)

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Audit Tools, cont.



- NGS
 - ADR Checklist
 - Mock Chart Checklist
 - Suggestions
- CGS
 - Medical Review ADR Process
 - HH and Hospice
- Other job aids

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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

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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

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Internal Steps/Actions

- Audit/Monitor medical record documentation
- Review your claims data
 - Payments, denials
 - Know your regional idiosyncrasies
- Know your agency's risk



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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

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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

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Conclusion

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



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Questions?

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- Kimberly Hrehor kim.hrehor@tmf.org
- Help Desk at PEPPERresources.org

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Resources

- CMS Medicare Learning Network email Listserv https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/Mailinglists_Factsheet.pdf
- Open Door Forum https://www.cms.gov/Outreach-and-education/Outreach/OpenDoorForums/ODF_HHHDME.html
- CMS Internet Only Manuals (IOM): <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs.html> (100-2 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 K and Jurisdiction 6 National Government Services https://www.ngsmedicare.com/ngs/portal/ngsmedicare/newngs/entry!/ut/p/a1/04_Sj9CPykssy0xPLMnMz0vMAfGjzOJNHd1dDQ2dDbzdvtXNDBxNXAKDHH1DD52MjYEKIoEKDHAARwNC-sP1o1CV-Bv7WwCVuDm5uAQGGLs7GUEV4LGiIDfCINNURUREAsE8b8g!!/dl5/d5/L2dBISEvZ0FBIS9nQSEh/
- 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+Home?OpenForm>

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Resources, cont.

- CGS Hospice Medicare Billing Codes Sheet
https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_Medicare_Billing_Codes_Sheet.pdf
- CGS HHA Medicare Billing Codes Sheet
https://www.cgsmedicare.com/hhh/education/materials/pdf/home_health_billing_codes.pdf
- Hospice Public Use File: <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/Medicare-Provider-Charge-Data/Hospice.html>
- HHA Public Use File: <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/Medicare-Provider-Charge-Data/HHA.html>
- PEPPER email list: “Join Now” at <https://pepperresources.org/>
- National Hospice and Palliative Care Organization <http://www.nhpco.org/>
- National Association of Home Care and Hospice <http://www.nahc.org/>
- LeadingAge <http://www.leadingage.org/>
- VNAA <http://www.vnaa.org/>
- HCCA Compliance Weekly News: <http://www.hcca-info.org/Resources/HCCAPublications/ComplianceWeeklyNews.aspx>
- McKnight’s Newsletters: <http://www.mcknights.com/newsletters/>

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