# HOSPICE DENIAL FACT SHEET

## **Denial Reason 5PM01:** Six-Month Terminal Prognosis Not Supported

### What is the six-month terminal prognosis?

To be eligible for the hospice benefit, the patient must be considered to be terminally ill. Terminally ill means that the patient's life expectancy is 6 months or less, if the illness runs its normal course.

As a condition of payment under the Medicare hospice benefit, the six-month terminal prognosis must be supported in the medical record. The physician's clinical judgment must be supported by clinical information and other documentation that provides a basis for the six-month prognosis. Diagnosis alone may not support terminal prognosis; therefore, documentation in the medical record must support the terminal status.

## What should be documented to clearly support the six-month terminal prognosis?

Documentation is essential in "painting the picture", especially for patients that:

- Have remained on the hospice benefit for a long period of time; or
- · Have chronic illnesses with a more general decline.

Documentation to support the terminal prognosis at the time of the hospice admission may include:

- Changes in condition to initiate the hospice referral
- Diagnostic documentation to support terminal illness
- Physician assessments and documentation
- · A date of diagnosis
- A course of the illness
- The patient's desire for palliative, curative care
- · Records that show a trajectory of decline

Documentation to support the terminal prognosis throughout the hospice election:

- Changes in the patient's weight
- · Diagnostic lab results
- Changes in pain (type, location, frequency)
- Changes in responsiveness
- Skin condition (turgor)
- Changes in the level of dependence for ADLs
- Changes in anthropomorphic measurements (abdominal girth, upper arm measurements)
- Changes in vital signs (RR, BP, pulse)
- Changes in strength
- Changes in lucidity
- · Changes in intake/output
- Increasing ER visits or hospitalizations

#### Things to remember:

- Documentation to support terminal prognosis should be objective and include quantifiable values/measures (ex. Pounds, 4 on a scale of 1-5, inches, etc.)
- Documentation must "paint a picture" of the patient, their conditions and symptoms which support a life expectancy of 6 months or less.
- · Avoid the use of vague statements such as: "disease progressing" or "slow decline"





#### Where do I find more information?

- CGS's "Suggestions for Improved Documentation to Support Medicare Hospice Services"
  Quick Resource Tool: <a href="https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice\_documentation\_tool\_h-021-01\_07-2011.pdf">https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice\_documentation\_tool\_h-021-01\_07-2011.pdf</a>
- CGS's Appropriate Clinical Factors to Consider During Recertification of Medicare
   Hospice Patient's" Quick Resource Tool: <a href="https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice-clinical-factors-recert-tool-h-020-01-07-2011.pdf">https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice-clinical-factors-recert-tool-h-020-01-07-2011.pdf</a>
- Medicare Benefit Policy Manual (CMS Pub. 100-02), Ch. 9 §20.1: <a href="http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/bp102c09.pdf">http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/bp102c09.pdf</a>
- Hospice Local Coverage Determination (LCD), "Determining Terminal Status":
   http://www.cms.gov/medicare-coverage-database/details/lcd-details.aspx?LCDId=
   32015&Contrld=236&ver=11&ContrVer=2&CntrctrSelected=236\*2&Cntrctr=236&
   name=CGS+Administrators%2c+LLC+(15004%2c+HHH+MAC)&LCntrctr=236\*2&bc=AgACAAIAQAAA