The minutes below are a summary of the Advisory group meeting topics, group discussion, actions, and outcomes as a result of this meeting.

MEETING DETAILS

Date: March 6, 2018

Facilitator: Nykesha Scales, CGS Senior Provider Relations Representative

Attendees: 14 association representatives

AGENDA ITEMS

Education Topics for Group Feedback on Education Needs

CERT Discussion, Julene Lienard - Julene provided examples of hospice CERT errors for the meeting minutes which included:

- MISSING: 1) Physician signed and dated certification of terminal illness with narrative for benefit period #8 dates 01/20/2017 to 03/20/2017. 2) Attestation of face to face encounter for benefit period #8 dates 01/20/2017 to 03/20/2017. 3) Copy of face to face encounter note.

  - RECEIVED: 1) IDG notes/attendance for dates 01/31/2017, 02/14/2017 and 02/28/2017. 2) Certification of terminal illness for benefit periods #1 and #2. 3) Comprehensive assessment for start of care 09/29/2015. 4) Visit notes by nurse, aide and social worker for date span 02/01/2017 to 02/28/2017. 5) Care plan 9/29/2015. 6) Labs and MD notes from 2015.

  - REFERENCES: SSA 1862[a][1][A], 42 CFR 418.22.b.5 [Cert. of Terminal Illness/Content of Cert.], 42 CFR 424.5(a)(6) [Conditions for Medicare payment-Suff. Info], IOM 100-01, Chapter 4, Section 60 [Cert/Recert by Physicians for Hospice Care], IOM 100-02, Chapter 9, Section 20.1 [Timing and Content of Certification], IOM 100-04, Chapter 1, Section 110.1.C [Medical Record Material] and LCD L 34538 Hospice Determining Terminal Status, eff. 10/01/2015.

    - Insufficient documentation to support the hospice claim for dates of service 02/01/2017 to 02/28/2017 for routine hospice care in a long term care facility. There was no response to tech stop request for the missing documentation. Medicare requirements for payment are not met. Recertifications that require a face-to-face encounter but which are missing the encounter are not complete. The statute requires a complete certification or recertification in order for Medicare to cover and pay for hospice services.

- MISSING: 1) IDT meeting notes for team "South" for dates 2/23/17, 3/9/17 and 3/23/17. 2) Documentation of physician involvement in IDT meetings for 2/23/17 and 3/23/17

  - RECEIVED: 1) Plan of care for 1/5/17-4/4/17. 2) EOB. 3) Certification. 4) Hospice referral identifying beneficiary assigned to team designated South. 5) Partial IDT note for 3/16/17. and 6) Nursing notes. After return from tech stop, received: 1) Sign in sheets for North and South meetings in February and March 2017 (no physician signature is included for 2/23/17 and 3/23/17). It is noted that the 3/23/17 meeting sign in sheet states physician is on vacation, but do not see another physician involved

  - SSA 1862(a)(1)(A) and 42 CFR §418.56 (Condition of Participation: Interdisciplinary group, care planning, and coordination of services).

    - Submitted documentation does not meet Medicare requirements.

- MISSING: 1) Valid certification by the Hospice medical director with attestation statement for 4/15/17-7/13/17.
  - RECEIVED: 1) EOB; 2) Nursing notes; 3) IDT plan of care; 4) Initial certification that is missing the required attestation statement. After return from tech stop, received: 1) duplicate invalid certification
  - REFERENCES: SSA 1862 (a)(1)(A) and PUB 100-2 Chapter 9 § 20.1 (Timing and Content of Certification).
    - Per PUB 100-02, "The narrative shall include a statement directly above the physician signature attesting that by signing, the physician confirms that he/she composed the narrative based on his/her review of the patient's medical record or, if applicable, his or her examination of the patient."

Julene also asked the group to help keep her on her toes by checking the status of their CID when they submit additional documentation; there are times that CERT reverses the decision and deems there to be no error at which time she must submit the new decision to the Overpayment area at CGS in order to get their monies refunded.

Targeted Probe and Educate (TPE) Update - Sandy Decker provided an update on TPE. Per Medical Review (MR), hospice doesn't have a lot of activity currently for TPE. Almost all activity is related to home health. MR issued a group of letters to around 30 providers being placed on TPE for LOS>730 days with non-cancer diagnosis. However, MR had to contact the providers and tell them the notification letters they received were incorrect and to disregard until further notice. If the provider received such notification and no follow up phone call from MR, the notification is valid. The updated letters with correct data will be going out soon and the edit will be in place within a month.

Overall, nine providers for home health and hospice have completed Round 1. Two providers did not advance to Round 2, while the other seven providers advanced. Education calls continue. The average is 40-50 calls to provider requesting missing and/or incomplete documentation. As a reminder, providers do not have to wait until the end of the round to request education for claim denials or concerns. MR encourages providers to use the J15HHHProbeand Education mailbox to request education: J15HHprobeandEducation@cgsadmin.com.

The group was reminded of the available TPE resources, upcoming education, previous TPE Lunch & Learn recorded event and informed TPE notification and result letters are now available in the online Web portal, myCGS.

- CGS HHH TPE Web page, https://www.cgsmedicare.com/hhh/medreview/tpe_process.html
- TPE Lunch & Learn, https://www.cgsmedicare.com/hhh/education/recorded_webinars.html

Notice of Election (NOE) via EDI Status, https://www.cgsmedicare.com/hhh/education/materials/hospice_qrt.html - Prior to the meeting, Nykesha asked members to review new hospice quick resource tools (QRTs) developed in collaboration with Palmetto GBA and National Government Services (NGS) to assist providers with NOE and NOTR transactions submitted via EDI. The group suggested their members and providers liked the resources and found them helpful.

The group was asked if they believe providers feel more comfortable submitting these transactions via EDI now that CMS has advised previous system complications have been resolved. Group members believe providers are still apprehensive of using this submission method given the strict time limits in place for submissions. The group asked Nykesha for data as to how many providers have submitted NOEs via EDI since the system limitations were resolved in early February. Data requested after the meeting indicates only 16 NOE submissions have been received via EDI since the system issues were resolved. The group recommended additional messaging reminding providers this method of submission is now available as well as NOE timing tip sheets and reminders.

New Medicare Card Transition, https://www.cms.gov/Medicare/New-Medicare-Card/Providers/Providers.html - The New Medicare Card Transition begins next month. Group members were informed of previous education as well as plans for upcoming education. The newest information regarding the transition is the release of the mailing strategy which indicates several of CGS J15 HHH states will be included in Wave 1 (April – June 2018) and myCGS, our online Web portal, will house the Health Insurance Claim Number (HICN)/Medicare Beneficiary Identifier (MBI) Lookup Tool. Group members were reminded of the related transition period, lasting 21 months (April 2018 – December 2019), which should help to alleviate provider concerns. One group member asked if the Lookup Tool will remain in place after the transition ends. CMS has not informed CGS to remove this option from the portal after the transition. As such, the tool should remain available.

- Mailing Strategy, https://www.cms.gov/Medicare/New-Medicare-Card/NMC-Mailing-Strategy.pdf

myCGS Discussion, https://www.cgsmedicare.com/hhh/mycgs/index.html - The group was updated with the latest myCGS portal enhancements: TPE notifications and results available in the portal as of February 19, 2018 and updated CBR reports based on previous provider feedback. The enhanced CBR now inform providers what the report is, what type of data is included and how they compare to other providers in their state and jurisdiction 15. The group received the CBR instructional job aid (shown below). Nykesha advised the myCGS User Manual is currently being revised by the POE team. Also, since TPE notification and results letters are now being made available in the portal, the group was reminded of Green Mail and how opting in vs. opting out relates to gaining access to myCGS correspondence.

- Comparative Billing Report (CBR) Instructions, https://www.cgsmedicare.com/hhh/education/materials/pdf/mycgs_comparative_billing_reports_hhh.pdf

Medicare Administrative Contractor Satisfaction Indicator (MSI) Survey Announcement, https://www.cms.gov/Medicare/Medicare-Contracting/MSI/ - The 2018 MSI issued by CMS will be available the week of March 12th. Advisory Group members were thanked for their assistance with helping CGS spread the MSI news and increasing participation and asked to do the same for the 2018 MSI. Members were apprised of process improvements based on 2017 MSI feedback such as: reduction in the number of days ListServ messages are issued (Tuesday & Thursdays, unless an urgent notification is needed), improved website navigation by adding icons on the homepages so providers easily locate what they're looking for, increased educational offerings, more timely posting of all relevant claims processing issues on the Claim Processing Issues Log Web page, and more.

National Provider Enrollment Conference, https://med.noridianmedicare.com/web/medicare/national-provider-enrollment-conference - The National Provider Enrollment Conference will be held in San Diego, CA this year on April 24-25, 2018. Interested participants may register for free. The group was advised there is a direct link to registration on our homepage.

No further suggestions were received for topics that require additional education.

CGS Website Updates (http://www.cgsmedicare.com/hhh/index.html)

The group was notified that 64 articles/updates have been posted since December's meeting, 31 ListServ messages were sent to subscribers and of the following updates to the CGS website.

- Billing & Claims

  - **Updated:** Top Claim Submission Errors (Reason Codes) and How to Resolve Web page, https://www.cgsmedicare.com/hhh/education/materials/cses.html - Now includes January statistics

  - **Updated:** Hospice Medicare Billing Codes Sheet, https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_medicare_billing_codes_sheet.pdf - Now includes information regarding the D0 condition code and 56 occurrence codes used to correct

NOE and/or NOTR dates based on Change Request 10064 and CMS manual updates

- **Updated:** Hospice Claims Filing Web page, https://www.cgsmedicare.com/hhh/education/materials/hospice_cf.html - Updated to include information that effective 1/2/2018, hospice providers may submit NOE billing transactions via EDI and a link to the CMS Companion Guide

- **New:** Claim Page 01 – Correcting a Notice of Election (NOE) Web page, https://www.cgsmedicare.com/hhh/education/materials/claim_page_1_correcting_noe.html

- **New:** Claim Page 01- Correcting a Notice of Termination/Revocation – NOTR (8XB), https://www.cgsmedicare.com/hhh/education/materials/claim_page_1_correcting_notr.html

- **New:** Submitting a Hospice Notice of Election (NOE) via EDI (TOB 8XA), https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_noe_tob8xa.pdf - New Web pages and resources developed per CR 10064

- Local Coverage Determinations (LCDs)/Coverage

  - **Updated:** LCDs/Coverage Webpage, https://www.cgsmedicare.com/hhh/coverage/index.html - A list of LCDs was added to the LCD/Coverage Web page and link directly to the CMS Coverage Database for improved navigation

- Medical Review

  - **Updated:** Hospice Top Medical Review Denial Reason Codes Web page, https://www.cgsmedicare.com/hhh/medreview/hos_denial_reasons.html -Updated with last quarter data for 2017

  - **Updated:** CERT Web page, https://www.cgsmedicare.com/hhh/education/materials/cert.html - Point of Contact information updated to explain that subsequent ADR letters can be sent to a specific correspondence address that may be provided by contacting a CERT Customer Service Representative

- Additional Resources

  - **Updated:** ELGA and ELGH Overview of Key Field QRT, https://www.cgsmedicare.com/hhh/education/materials/pdf/elga-elgh_key_fields.pdf - Medicare Secondary Payer pages changed as appropriate (Providers may now access with NPI only)

  - **Updated:** Frequently Asked Questions, https://www.cgsmedicare.com/hhh/education/faqs/index.html - POE as completed the quarterly review and will review again by end of March 2018

  - **Updated:** Hospice Prescription Drug Reporting Table QRT, https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_presdrugreportingtable.pdf - Link added to CMS 2018 Table of Drugs

  - **Updated:** Hospice References QRT, https://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_tools.pdf -Various website links on page 9 updates as necessary

  - **New:** HHH Recorded Webinars, https://www.cgsmedicare.com/hhh/education/recorded_webinars.html - Group informed educational events, successfully recorded, will now be housed on this new Web page

  - **Updated:** Education & Resources Web page, https://www.cgsmedicare.com/hhh/education/index.html - New CMS MLN button posted as well as other new icons

Upcoming CGS Education Events

- Future education events are posted to the "Calendar of Events Home Health & Hospice Education" Web page, https://www.cgsmedicare.com/medicare_dynamic/wrkshp/pr/HHH_Report.asp– Group reminded to stay tuned to the calendar of event for upcoming education and asked to let CGS POE staff members know if they need speakers for their events.

CGS Data Analysis

Claim submission data, Claim Submission Errors (CSEs) and Top Medical Review Denial Data were distributed to the group and reviewed.

Next CGS Advisory Group Meeting

The next Hospice POE AG meeting is scheduled for July 10, 2018, from 9:30-11:30 a.m. (Central Time).