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: April 18, 2017

Facilitator: Nykesha Scales, CGS Senior Provider Relations Representative

Attendees: 11 association representatives

AGENDA ITEMS

Education Topics for Group Feedback on Education Needs

- **Comprehensive Error Rate Testing (CERT) Program Discussion, Julene Mull** – CGS, CERT Coordinator, Julene Mull joined the group to discuss the following information:

    1. Respond to CERT inquiry or claim will be found in error and money will be recouped.

        a. If records are sent in and another request is received; please contact Julene, so we can check to be sure the records were received. This will avoid an error for no response.

        b. This not only avoids an error with CERT but allows payments from CGS to be processed without the delay of authenticating or requesting an attestation.

    2. Valid Hospice Certification Narrative Statement

        a. Per The Medicare Benefit Policy Manual, Ch.9 – Coverage of Hospice Services Under Hospital Insurance, PUB 100-02, Section 20.1, https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c09.pdf, "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. The physician may dictate the narrative."

    3. Miscellaneous errors

        a. Missing signed reports/notes for Interdisciplinary Team (IDT)/ Plan of Care (POC) Conferences

        b. Missing signed Interdisciplinary Group (IDG) notes

        c. Missing nurse daily signed notes

        d. Units incorrectly coded

- **2017 MAC Satisfaction Indicator (MSI) -** Nykesha informed the group the MSI went live April 5, 2017. The group was thanked for their tremendous help with the participation rate for the 2016 MSI and was asked to assist CGS with getting the message out concerning the 2017 MSI. CGS POE created a postcard flyer that was shared with the AG. Members were informed this postcard would be utilized for the upcoming in person events and encouraged to share the flyer as appropriate. The survey ended May 24, 2017, at 11:59 p.m. EST.

- **Attending Physician Discussion, Sandy Decker –** Sandy discussed the following topics with the AG members:

    1. Role of Attending Physician – Chosen by beneficiary or representative. Most active in care of beneficiary. Beneficiary does not have to choose an attending.

2. General Inpatient in hospital environment – Hospice nurse, etc. must visit patient in hospital environment, even though hospital staff has primary care of beneficiary. If the hospital does not allow privileges to the beneficiary's chosen attending, the hospitalist may take over as attending while patient is in hospital. Must document what has happened and that beneficiary agrees to change in attending physician.

3. CGS is working with the other HHH MACs to develop additional resources concerning attending physician frequently asked questions.

- **MM9932: Preventing Hospice Notices of Election with Future Dates,** https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM9932.pdf - Nykesha informed the group of MM9932 which will prevent hospices from having the option of entering in notices with future dates. The system will not accept future dates in the admission/from fields and this is effective July 1, 2017, with an implementation date of July 3, 2017. As the article mentions, while this has been an uncommon error in the past, it's a costly one, so this change is a good implementation.

- **Notice of Election (NOE) Timely Filing and Exceptional Circumstance Guidelines Quick Resource Tool (QRT),** https://www.cgsmedicare.com/hhh/education/materials/pdf/noe_timely_filing_except_circumstances_guide.pdf - AG members were reminded that in light of SE1633, suggestions were made to offer providers resources concerning the NOE process and updates in light of recent CMS clarifications during our last meeting. CGS collaborated with NGS and Palmetto GBA to create the following QRT, which was also shared with CMS and approved by them, to offer a companion guide to lessen NOE confusion. The QRT includes the NOE fields, possible issues, claims processing system information and suggested corrections and outcomes. Group members were pleased with the QRT and have shared with their members.

- **Mail Initiative myCGS Green Expansion -** The group was updated on the myCGS Web portal and recent enhancements concerning the correspondence and response elements. In the past, most responses to requests received via myCGS were handled via mail. As part of the CGS Green Mail Initiative, going forward myCGS users will have the capability to receive notifications/responses to items such as pre-payment and post-payment reviews and much more within the Web portal. An 'Opt In' function for providers to select to receive all correspondence within the portal went live in May. Providers can also elect to 'Opt Out' and continue to receive their notifications using traditional methods. This selection is to be made by the myCGS Administrator.

- **Multi-Factor Authentication (MFA),** https://www.cgsmedicare.com/articles/cope2540.html - Nykesha informed the group as of July 1, 2017, all myCGS users will be prompted to use MFA. This is an extra level of security that CMS is enforcing for all MACs. Prior to July 1, 2017, new myCGS users and existing users who make changes to their account will be prompted to opt in for MFA. CGS has done education regarding MFA and will continue to do so ensuring all myCGS users are informed and aware of MFA requirements.

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

The group was notified of the following updates to the CGS website.

- Appeals

  - **New:** "Medicare Claim Appeals Process" for Part A, Part B, and HHH" Online Education Course (OEC), https://www.cgsmedicare.com/medicare_dynamic/education/001.asp

  - **New:** "CGS Overpayment Demand Letter Required to Appeal Decisions from SMRC and RA" Article, https://www.cgsmedicare.com/articles/cope2416.html

CGS
A CELERIAN GROUP COMPANY

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

- Claims

  - **Updated:** Top Claim Submission Errors for Hospices: Error 34923 Web page, https://www.cgsmedicare.com/hhh/education/materials/34923.html - Updated screenshots with new nursing G-codes.

  - **Updated:** Claim Page 04 – Entering a Hospice Claim Web page, https://www.cgsmedicare.com/hhh/education/materials/claim_page_4.html - Added remarks regarding submitting an exception request due to a late submission of a NOE.

  - **Updated:** Examples of Denied/Granted Exception Requests Web page, https://www.cgsmedicare.com/hhh/education/materials/examples_denied_granted_exceptions.html - Updated based on SE1633.

  - **Updated:** Untimely Recertification and Occurrence Span Code (OSC) 77 Web page, https://www.cgsmedicare.com/hhh/education/materials/untimely_recert.html - Now includes information concerning Condition Code 85 per CR9590.

  - **Updated:** Change Request 8877 Web page, https://www.cgsmedicare.com/hhh/education/materials/cr8877.html - Added SE1633 and links to various CGS resources regarding untimely NOEs under the "Additional Resources" section.

  - **Updated:** Fiscal Intermediary Standard System (FISS) Common Locations Web page, https://www.cgsmedicare.com/hhh/claims/fiss_locations.html - Now includes information concerning the status location "S M87RE" and related description for providers requesting an exception for an untimely NOE and have included information in the Remarks Field.

  - **New:** MAP171E – Entering National Drug Code (NDC) Web page, https://www.cgsmedicare.com/hhh/education/materials/map171e.html

- Financial

  - **New:** "Interest Payment on Claims" Article, https://www.cgsmedicare.com/hhh/pubs/news/2017/0317/cope2437.html

- Medical Review

  - **Updated:** Hospice Top Medical Review Denial Reason Codes Web page, https://www.cgsmedicare.com/hhh/medreview/hos_denial_reasons.html - Updated with most recent, top hospice denial data reflecting January – March 2017 data.

- Additional Resources

  - **Updated:** Customer Service & Education Web pages, https://www.cgsmedicare.com/hhh/pubs/news/2017/0417/cope2702.html - Nykesha displayed recent cosmetic and Web design enhancements for the following Web pages.

  - **Updated:** Frequently Asked Questions (FAQs), https://www.cgsmedicare.com/hhh/education/faqs/index.html - POE completed their quarterly review and made the necessary updates to the FAQs.

    - December 21, 2016, HH&H What's New Ask-the-Contractor Teleconference FAQs Added

    - **New:** Hospice Billing FAQs (#27/Medicare Care Choice Model (MCCM) & #28/Advance Care Planning (ACP))

  - **Updated:** Recovery Audit Program Web page, https://www.cgsmedicare.com/hhh/medreview/recovery_audit_program.html - Updated to remove list of Recovery Audit Contractors (RACs) and replaced with a direct link to a list of RACs on the CMS Web page. Additionally, the Program Comparison Web page was removed and a link to the CMS MLN SE1123, "Contractor Entities at a Glance: Who May Contact You About Specific CMS Activities" was added.

- **Updated:** Hospice Election Requirements Web page, https://www.cgsmedicare.com/hhh/coverage/coverage_guidelines/election_requirements.html - Updated to include language provided by CMS with references to SE1628 and SE1631.
- **Updated:** Hospice Certification/Recertification Requirements Web page, https://www.cgsmedicare.com/hhh/coverage/coverage_guidelines/cert_recert_requirements.html

Upcoming CGS Education Events

Future education events are posted to the "Calendar of Events Home Health & Hospice Education" Web page, https://www.cgsmedicare.com/hhh/education/Education.html – 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 25, 2017, from 9:30 - 11:30 a.m. (Central Time).