

*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:** December 5, 2017

**Facilitator:** Nykesha Scales, CGS Senior Provider Relations Representative

**Attendees:** 12 association representatives

## AGENDA ITEMS

### Education Topics for Group Feedback on Education Needs

**Targeted Probe and Educate (TPE) Process, Ronda Tipton** - Ronda Tipton, the CGS J15 Home Health and Hospice Medical Review (MR) Manager joined the group to discuss TPE, the review process, and its impact to hospice providers. The following resources (referenced below) were highlighted, trending questions were mentioned and the group was offered the opportunity to pose their questions/concerns to MR staff.

- CGS HHH TPE Web page, [https://www.cgsmedicare.com/hhh/medreview/tpe\\_process.html](https://www.cgsmedicare.com/hhh/medreview/tpe_process.html)
- TPE FAQs, [https://www.cgsmedicare.com/hhh/education/faqs/tpe\\_faqs.html](https://www.cgsmedicare.com/hhh/education/faqs/tpe_faqs.html)
- Medical Review Activity Log, <https://www.cgsmedicare.com/hhh/medreview/activitylog.html>

These Q&As were posed during the meeting:

**Q:** How often do you change topics/areas of focus?

**A:** Topics/areas of focus are based on the review of data and what areas stand out during data analysis and some items were already areas of concern and just added to TPE.

**Q:** Do you have the number of hospices that could be under TPE?

**A:** Not at this time.

**Q:** Can hospice agencies use PEPPER data to help?

**A:** Yes, PEPPER data can be helpful to hospice providers with the TPE process.

**Q:** What determines if an agency has 20 claims reviewed versus 40 claims?

**A:** This is based on the actual provider and their billing practices.

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

- Interdisciplinary Team (IDT) sign in sheets for 9/6/16, 9/20/16 and 8/23/16. However, no IDT note was provided for 8/23/16 to support hospice services for 9/1/16-9/5/16.
- Verbal Start of Care (VSOC) documented in the RN authenticated plan of care (POC) is not dated; unable to support timing requirements. The order detail report for the certification of illness, shows routing, but does not state a verbal order was received from either the attending or the hospice medical director. Beneficiary with prostate cancer with bone metastases on hospice admission. Refusing further treatment. Progressive decline; actively dying during claim period.
- **MISSING:** 1) Documentation which supports physician involvement with IDT meetings.
- **MISSING:** 1) Face to face encounter attestation which supports benefit period #5 dates.
- VSOC within the initial POC is not dated, the attending physician's written certification was not obtained until 11/07/2016; unable to support certification timing requirements are met.

The 10/18/2016 IDT attendance log and census sheet received as late documentation are insufficient to support IDT POC review requirements; need documentation supporting IDT discussion and what, if any, changes were made to the POC.

After Julene discussed recent CERT examples for hospice providers, the group suggested further education concerning electronic signatures as well as date/time requirements. CGS will work on a reminder article surrounding these topics. Advisory group members informed of upcoming CERT and Signature education slated for early 2018 and encouraged to forward questions for these events to Julene or Nykesha for inclusion.

**NOE via EDI Discussion, Gloria Lucas** – Gloria, the CGS EDI Team Lead, reminded the group Notices of Election (NOE) can be submitted electronically beginning 1-2-2018, and provided the following tips and resources:

- Electronic files go through a cycle before they can be viewed in the FISS system.
- Files can be viewed in FISS the next day.
- Files received later in the evening may take 2 days to view in FISS.
- NOEs should be submitted in a separate file from other claims. This will make it easier to check for NOEs and make any needed corrections.
- Providers are encouraged to check the FISS system for NOEs to ensure they made it into the processing system without any errors.
- The following data elements are needed for NOEs
  - CLM05-1 Facility Type Code/Type of Bill must be: 81 – Hospice/Non Hospital-Based or 82 – Hospice/Hospital-Based
  - CLM05-3 Claim Frequency Type Code must be: A- Admission Election Notice, B- Hospice Termination/Revocation Notice, C- Hospice Change of Provider Notice, D- Void/Cancel Hospice NOE Only, or E- Hospice Change of Ownership
  - Statement From and Through Date
  - Information for the Service Line: Revenue Code 0650, HCPCS Q5009, Service Date, Units must be 1, Charges must be \$0.00

**Q:** Can testing be submitted for NOEs?

**A:** Yes, providers may submit a test file. They will receive a 999. If their file passes the 999, they will receive a 277CA.

Test files must be marked as “Test” by using indicator “T” in the ISA15 field. Test files must be submitted using the provider/clearinghouse/billing service’s current submitter ID.

The NOE Companion Guide has additional information and can be located at <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Hospice/Downloads/Companion-Guide-Electronic-Notices-Election.pdf>.

CGS will include a link to this document on our website. POE is finalizing development of Job Aids/Resources to assist providers with filing NOE’s electronically, which should be posted by the end of month. The group suggested future messages concerning this implementation mention the timeframe it can take for NOE files to show in FISS once submitted via electronically and that they still have the traditional methods for submitting i.e. DDE/FISS or paper.

**Attending Physician Discussion & Six Month Prognosis Discussion, Sandy Decker** - Sandy updated the group concerning the Attending Physician Workgroup’s efforts and discussions with CMS. The Attending Physician Workgroup is working with CMS to clarify some of the regulations concerning attending physicians and the signatures required on the certificate of terminal illness (COTI).

Two links on the CGS website were reviewed to assist clinicians and physicians in documentation details.

- Appropriate Clinical Factors to Consider During Recertification of Medicare Hospice Patients Tool, [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)
- Suggestions for Improved Documentation to Support Medicare Hospice Services Tool, [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)

**New Medicare Card Project/Social Security Number Removal Initiative (SSNRI)**, <https://www.cms.gov/Medicare/New-Medicare-Card/index.html> - Group reminded new Medicare cards are coming starting in April 2018 and asked for concerns they are hearing. Members voiced the main concern is when the look-up tool will be made available. Nykesha advised all Medicare providers should have received a 'Dear Medicare Provider' letter in the fall indicating the look-up tool will be available via myCGS, the online web portal, in June 2018. As mentioned in the July meeting, CGS will continue to add information regarding this initiative to all upcoming educational events. The group was asked to help spread the word about this project, available resources and to help prepare patients.

**myCGS Updates**, <https://www.cgsmedicare.com/hhh/mycgs/index.html> - Nykesha advised the group of recent updates regarding myCGS which include a new process for the opt in/opt out selection. Providers who opt in will receive correspondence within the online web portal, and providers who opt out will continue to receive their notifications such as redetermination results and etc. via the normal methods and they will be available within the portal should providers choose to log in and retrieve. Additionally, CGS has launched a Comparative Billing Report (CBR) feature within myCGS for HHH providers. The group was sent an email in advance of the meeting with general instructions and asked to provide feedback on the process as CGS is conducting a review phase of the process. Instructions will be added to the appropriate myCGS User Manuals as soon as possible.

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 of the following updates to the CGS website.

#### **Claims**

- **Updated:** Hospice Expedited Determination Process Web page, [https://www.cgsmedicare.com/hhh/coverage/coverage\\_guidelines/expedited\\_determination\\_process.html](https://www.cgsmedicare.com/hhh/coverage/coverage_guidelines/expedited_determination_process.html) - URL to CMS 'FFS Expedited Determination Notices' corrected
- **Updated:** Hospice Sequential Billing Web page, [https://www.cgsmedicare.com/hhh/education/materials/hospice\\_sequential\\_billing.html](https://www.cgsmedicare.com/hhh/education/materials/hospice_sequential_billing.html) - Now better explains what happens to incoming claims when prior claims are in RTP file
- **Updated:** Top Claim Submission Errors (Reason Codes) and How to Resolve Web page, <https://www.cgsmedicare.com/hhh/education/materials/cses.html> - Includes most recent monthly data (October) and format of Web page redesigned to convey monthly statistics
- **Revised:** Claim Processing Issues Log, [https://www.cgsmedicare.com/hhh/claims/fiss\\_claims\\_processing\\_issues.html](https://www.cgsmedicare.com/hhh/claims/fiss_claims_processing_issues.html) - Updated to include information as required in Change Request 10258 and revamped to better display the issues

#### **Financial**

- Updated: Hospice Payment Rates Web page, [https://www.cgsmedicare.com/hhh/claims/fees/hospice\\_rates.html](https://www.cgsmedicare.com/hhh/claims/fees/hospice_rates.html) - Updated to include links to the FY 2018 wage index and the MLN that includes the FY 2018 hospice rates

- **Updated:** Hospice Payment Rates Calculator, [https://www.cgsmedicare.com/medicare\\_dynamic/Hospice\\_Rate\\_Calculator/Index.asp](https://www.cgsmedicare.com/medicare_dynamic/Hospice_Rate_Calculator/Index.asp) - FY 2018 rates and wage index information added

#### Medical Review

- **Updated:** Hospice Top Medical Review Denial Reason Codes Web page, [https://www.cgsmedicare.com/hhh/medreview/hos\\_denial\\_reasons.html](https://www.cgsmedicare.com/hhh/medreview/hos_denial_reasons.html) - July - September 2017 quarterly data posted

#### Provider Enrollment

- **New:** Provider Enrollment Application Issues Web page, <https://www.cgsmedicare.com/hhh/enrollment/peai.html> - New Web page created to display monthly data issues with both online PECOS and paper CMS-855 applications
- **Updated:** Tools, Tracking & Resources Web page, <https://www.cgsmedicare.com/hhh/enrollment/tools.html> - URL to the CMS Medicare Enrollment Resources Tool added

#### Additional Resources

- **Updated:** Frequently Asked Questions (FAQs) Web page, <https://www.cgsmedicare.com/hhh/education/faqs/index.html> - Quarterly review complete; FAQs updated as appropriate
- **Updated:** Self-Service Options Web page, <https://www.cgsmedicare.com/hhh/tools/index.html> - 2018 Provider Contact Center (PCC) calendar including training closures added

#### Upcoming CGS Education Events

Future education events are posted to the “Calendar of Events Home Health & Hospice Education” Web page, <http://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. CERT, TPE, and Signature Guidance education is slated for early 2018.

#### 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 March 6, 2018, from 9:30-11:30 a.m. (Central Time).