



CLINICAL & REGULATORY UPDATE

2017-23 | November 7, 2017

The Connecticut Association for Healthcare at Home supports its members in the provision of exceptional quality and accessible services through collaboration, leadership, provision of information, advocacy and education.

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HOME HEALTH

HHGM Proposal Not Finalized in CMS' 2018 Prospective Payment System Rate Update

Source: NAHC, November 2, 2017

The Center for Medicare & Medicaid Service has issued the Calendar Year (CY) 2018 Home Health Prospective Payment System Rate Update final rule on the Federal Register, public inspection page.

CMS indicates that based on the comments received it is not finalizing the HHGM proposal for a new payment model in 2019 at this time.

[Continue Reading](#)

CMS Releases Draft Conditions of Participation Interpretive Guidelines

The Centers for Medicare and Medicaid Services (CMS) released the draft version of the Home Health Agency Conditions of Participation (HHA CoP) Interpretive Guidelines to industry stakeholders.

The guidelines are available to members for comment.

[View Guidelines](#)

MAC NGS Offers Additional Detail About Targeted Probe-and-Educate Reviews

Source: HHL

CMS' targeted probe-and-educate reviews for home health will consist of three rounds if agencies ensnared in it have a "high payment error rate above 15%," Medicare Administrative Contractor (MAC) NGS explained during an Oct. 24 webinar.

Round 1 will result in a review of 20 to 40 claims per affected provider, and non-responders

could be referred to a recovery auditor (RAC), Zone Program Integrity Contractor (ZPIC) or Unified Program Integrity Contractor (UPIC).

If providers continue to have high error rates after three rounds of probe-and-educate reviews, NGS says, CMS may instruct the MAC for additional action including: Extrapolation, referral to the ZPIC or UPIC, referral to the RAC or 100% pre-pay review.

Related link: Watch an NGS video on targeted probe-and-educate reviews at <http://bit.ly/2i3db28>.

HOSPICE

Preparing for Hospice Targeted Probe and Educate (TPE)

Source: October 31, 2017 by Katie Wehri

As previously reported, the targeted probe and educate (TPE) process is replacing the medical review process used by Medicare Administrative Contractors (MAC). Each of the three MACs - Palmetto GBA, NGS and CGS - can choose the topics for review under TPE based on existing data analysis procedures.

[Continue Reading](#)

CMS Posts CR 10263: Provider Education and Referral Reporting

Source: NHPCO

The purpose of [Change Request 10263](#) is to provide instructions to the Medicare contractors regarding reporting of provider education and referrals. CMS and its MACs are moving toward a medical review strategy that includes increased provider education as well as a continuum of compliance model that involves moving providers through a continuum of medical review, or removal from medical review for periods, dependent upon their billing patterns and claim review findings. At the provider level, CMS will be requiring reporting of review findings, education, and potential referrals within the continuum of compliance.

This CR's implementation date is November 27, 2017.

OIG Begins Review of Nurse Aide Supervision

Source: NHPCO

In the last few days, selected hospices have received notices from the HHS Office of Inspector General inquiring about "hospices' registered nurse visits to Medicare beneficiaries' homes. Our objective is to determine whether hospices ensured that registered nurses visited hospice beneficiaries' homes at least once every 14 days in accordance with Federal requirements." The reference to "at least once every 14 days" is to the nurse supervision of the hospice aide and is one of the issues listed in the [OIG's 2017 Work Plan](#).

If your hospice has received a letter, please pay close attention to the timeline for submitting materials and include any documentation for nurse supervision of aide visits.

QUESTIONS? CONCERNS? COMMENTS?
Connecticut Association for Healthcare at Home
Tracy Wodatch
VP of Clinical & Regulatory Services
wodatch@cthealthcareathome.org

