

**2020 Virtual A/B,  
Home Health and  
Hospice Medicare  
Summit:  
Understanding  
Medicare as a Whole**

# **Home Health Regulatory & Compliance: Partnering to Meet the Challenges**



**Part A/B, Home Health & Hospice  
Multi-MAC Collaboration Group**

# Summit Participants

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- CMS Investigation & Audit Group
- The Department of Justice (DOJ) Medicare Fraud Strike Force
- The NHPCO
- The NAHC
- Connect Consulting
- Palmetto GBA
- Noridian Healthcare Solutions
- WPS GHA
- Maximus (QIC)
- C2C Innovative Solutions (QIC)s
- Livanta (QIO)
- General Dynamics Information Technology: Benefits Coordination & Recovery Center (BCRC)
- CoventBridge Unified Program Integrity Contractor (UPIC)
- National Government Services

# Session Presenters

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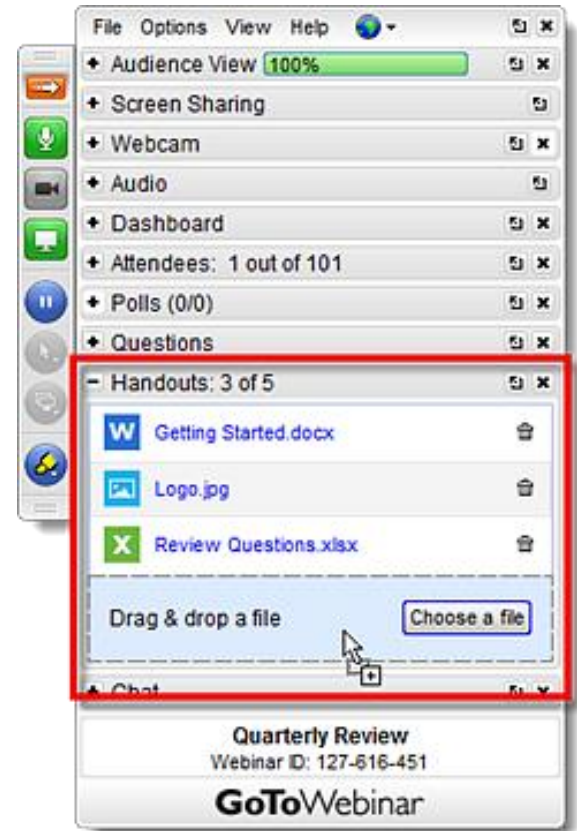
- **Katie Wehri, BSBA**
  - Director Home Care & Hospice Regulatory Affairs, NAHC
- **Charles Canaan, RN, MPH**
  - Senior Consultant Provider Outreach & Education, Palmetto GBA
- **Colleen Harryman, POE Consultant**
  - Noridian Healthcare Solutions
- **Shelly Dailey, MSN, BSN, RN, CPHM**
  - Provider Outreach & Education Consultant, NGS

# Today's PowerPoint Presentation

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Once you are connected to the webinar, select Handouts

Select the PowerPoint PDF to download the presentation



# No Recording

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- Attendees/providers are **not** permitted to record (tape record or **any** other method) today's educational event

# Disclaimer

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This presentation was current at the time it was published or uploaded onto the web. Medicare policy changes frequently so links to the source documents have been provided within the document for your reference.

This presentation was prepared as a tool to assist providers and is not intended to grant rights or impose obligations. Although every reasonable effort has been made to assure the accuracy of the information within these pages, the ultimate responsibility for the correct submission of claims and response to any remittance advice lies with the provider of services.

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# Objectives

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- Deliver home health provider updates regarding federal regulatory changes that may impact agency policies in 2020- 2021

# Agenda

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- Regulatory Updates
- Let's play Stump the Contractor
- References and resources





# **Regulatory Updates**

# Physician and Non-Physician Practitioner Documentation Responsibilities

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**Plans of Care and Certifying/Recertifying Patient Eligibility:** In addition to a physician, section 3708 of the **CARES Act** allows a Medicare-eligible home health patient to be under the care of a nurse practitioner, clinical nurse specialist, or a physician assistant who is working in accordance with State law. These physicians/practitioners can: (1) order home health services; (2) establish and periodically review a plan of care for home health services (e.g., sign the plan of care), (3) certify and re-certify that the patient is eligible for Medicare home health services

**This is a permanent change**

These changes are effective for Medicare claims with a “claim through date” on or after 3/1/2020

[Home Health Agencies: CMS Flexibilities to Fight COVID-19](#)

# Review Choice Demonstration

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## **Who:**

Home Health providers in the states of Illinois, Ohio, Texas, North Carolina and Florida.

## **What:**

CMS restarted the Review Choice Demonstration (RCD) following the pause for COVID-19. Home Health claims in all demonstration states with billing periods on or after 8/31/2020 will be subject to review under the requirements of the choice selected. Palmetto GBA will conduct post-payment review on claims subject to the demonstration that were submitted and paid during the pause.

# Medicare HH PPS Proposed Rule

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## CY 2021 Home Health Prospective Payment System Rate Update and Quality Reporting Requirements-Proposed Rule

- 2.7% rate update
  - Maintains PDGM case mix model and LUPA thresholds
  - New wage index areas with 5% cap on reductions
  - Outlier standards maintained
  - No new behavioral adjustment
- Telehealth use standards made permanent
- 2021 Home infusion therapy supplier clarified
- Home health quality reporting and OASIS

# Telehealth

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- Proposing to permanently allow the use of remote patient monitoring or other telecommunications as outlined in the CARES Act during the PHE
- Tied to patient specific needs identified in the comprehensive assessment
- Describe in the POC how the use of telehealth will help to achieve goals
- Cannot substitute for an ordered home visit
- Cannot be considered a home visit for eligibility or payment
- Continue to report as administrative cost

# Home Infusion Therapy Supplier

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- New Part B benefit -coverage and payment finalized in the 2019-20 HHPPS rules
- Covers the professional services related to HIT for Part B drugs- infused via a pump
- HIT suppliers must be accredited by a Medicare approved AO
- HHAs may become HIT supplier
- HHAs may contract with a HIT supplier
- Skilled services related to Part B infusion drugs carved out of the home health benefit beginning 1/1/2021
- Currently DME suppliers with pharmacies are able to bill under the new benefit

# Home Infusion Therapy Supplier

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- Proposed rule outlines the provider enrollment requirements
- Accredited by a CMS approved accrediting organization
- Comply with the conditions for payment and coverage under
- Section 410.1500- 1550 and Section 486.500-525
- Submit Form CMS-855B application
- Subject to the application fee (2020 -\$595)
- Limited risk level category for screening
- Same appeal rights for enrollment denials and revocations
- HHAs should begin working with DME and HIT suppliers

# Quality Reporting Program & OASIS

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No proposed changes to HH QRP for CY2021

Proposed change in OASIS testing for new agencies

- Eliminate the testing requirement due to iQIES

Reminders

- OASIS-E delayed until January 1st of the year that is at least 1 full calendar year after the end of the COVID-19 PHE
- 20 measures for CY2022 HH QRP finalized last year





# Let's Play Stump the Contractor!

## **As a reminder:**

Claim specific questions must be addressed  
individually by your contractor

Questions must not contain  
protected/private/patient health information

# To Ask a Question Using the Question Box

The screenshot displays the GoToWebinar interface with several panels:

- Attendee List (2 | Max 201):** Shows 'Attendees (1)' and 'Staff (1)'. A dropdown menu is set to 'NAMES - ALPHABETICALLY', listing 'Corena Bahr (Me)'. A search box is located below the list.
- Audio:** Includes 'Audio Mode' options: 'Use Telephone' (unselected) and 'Use Mic & Speakers' (selected). A 'MUTED' status indicator and a volume level bar are shown, along with an 'Audio Setup' link.
- Talking:** Indicates 'Talking: Suzie Smith'.
- Questions:** Features a 'Questions Log' with a question 'Q: Is there a volume discount?' and an answer 'A: Yes! We will send you more info after the event.' Below the log is a text input field containing 'Yes' and a 'Send' button.

Two red arrows provide instructions: one points to the text input field with the text 'Type questions here', and the other points to the 'Send' button with the text 'Then click Send'.

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# References & Resources

# CMS References and Resources

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- [CMS IOM Publication 100-02, \*Medicare Benefit Policy Manual\*, Chapter 7](#)
- [CMS IOM Publication 100-04, \*Medicare Claims Processing Manual\*, Chapter 10](#)
- [CMS IOM Publication 100-08, \*Medicare Program Integrity Manual\*, Chapter 6](#)

# CMS References and Resources

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- [HH PPS web page](#)
- [Medicare HHA website](#)
- [Medicare Learning Network® publication, “\*Home Health Prospective Payment System\*”](#)

# Contractor & Association References & Resources

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- [National Government Services](#)
- [Palmetto GBA](#)
- [National Association for Home Care & Hospice](#)
- [Noridian](#)

# Contact Us

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## National Government Services

Email [J6.provider.training@anthem.com](mailto:J6.provider.training@anthem.com)

State/Region	Toll-Free Number	PCC Hours of Service
Alaska, Arizona, California, Hawaii, Idaho, Nevada, Oregon, Washington, American Samoa, Guam, Northern Mariana Island	866-590-6724 TTY: 888-897-7523	Monday–Friday, 8:00 a.m.–4:00 p.m. PT
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont	866-289-0423 TTY: 866-786-7155	Monday–Friday, 8:00 a.m.–4:00 p.m. ET
Michigan, Minnesota, New York, New Jersey, Wisconsin, Puerto Rico, U.S. Virgin Islands	866-590-6728 TTY: 888-897-7523	Monday–Friday, 8:00 a.m.–5:00 p.m. CT 9:00 a.m.–6:00 p.m. ET

# Contact Us

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## Palmetto GBA

Mail	Toll-Free Number	PCC Hours of Service
Palmetto GBA HHH PCC Mail Code: AG-840 P.O. Box 100238 Columbia, SC 29202-3238	855-696-0705	Monday–Friday, <b>HHH PCC Hours: 8 a.m. to 5 p.m. ET</b>

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## Noridian Healthcare Solutions

State/Region	Toll-Free Number	Website Address
<b>A/B MAC Jurisdiction E</b> CA, HI, NV, American Samoa, Guam, Northern Mariana Islands	855-609-9960	<a href="#">Part A</a> <a href="#">Part B</a>
<b>A/B MAC Jurisdiction F</b> AK, AZ, ID, MT, ND, OR, SD, UT, WA, WY	877-908-8431	<a href="#">Part A</a> <a href="#">Part B</a>

# Medicare University Self-Reporting Instructions

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Log on to the National Government Services [Medicare University site](#)

- Course Topic/Title = **Home Health Regulatory & Compliance: Partnering to Meet the Challenges**
- Medicare University Credits (MUCs) = **1**
- Catalog Number = **AA-C-05446**
- Participant Code = **20266WCRBR1**
- For step-by-step instructions on self-reporting please visit the **Get Credit for Completed Courses** on the NGS website

# Thank You for Joining Us

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You can type any questions relevant to this presentation in the question box on your control panel, be sure to then hit the SEND button

Remember, no PHI or PII