

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 19, 2019

Facilitator: Nykesha Scales & Sandy Decker, CGS Senior Provider Outreach & Education

Attendees: 20 association representatives

AGENDA ITEMS

Attendance/Roll Call

Follow-Up Items from December 2018 Advisory Group Meetings

No comments.

Education Topics for Group Feedback on Education Needs - Group

CGS hosted our first hybrid meeting with several advisory group representatives, from both our Home Health and Hospice groups, visiting our office headquarters in Nashville, TN. Other state and national representatives joined via teleconference. CGS Directors from departments such as Medical Review, Appeals, Provider Enrollment and more stopped in to visit with our advisory group members. Members reported they really enjoyed this meeting format. CGS is looking forward to hosting more meetings of this nature in the future. We'd like to offer a special thank you to the members who traveled to visit with us in person.

Education Topics for Group Feedback on Education Needs - Group

- **CERT Corner**, <https://www.cgsmedicare.com/hhh/education/materials/cert.html> - The group was commended for their efforts of sharing resources and information about CERT education. The CERT error rate reflects these efforts. The most recent errors were home health related and revolved around the plan of care (POC), certification issues and services cited as medically unnecessary. Hospice errors revolved around certification issues.
 - **Question:** If a provider disagrees and challenges a CERT denial that is overturned, does that count against the error rate?
 - **Answer:** No, it's removed.
 - **Question:** Regarding the POC Advance Directive matter, what should providers put in this section?
 - **Answer:** Providers should first advise there is an advance directive and what that is by indicating as much as they know/can.
- **Targeted Probe and Educate (TPE) Process Update**, <https://www.cgsmedicare.com/hhh/pubs/news/2019/0119/cope11067.html> - The group was apprised of current TPE activities and top denials as indicated on the process update article and related webpage. Face to face (F2F) remains a big concern with home health providers. TPE for hospice has begun but activity is low and data is scarce. The group went over available data. POE reminded the group to make sure they are advising providers to check for TPE notifications and related Additional Development Requests (ADRs). The amount of providers not responding to ADR requests continues to be an issue.
 - **Question:** Are providers taking advantage of the education, any stats?
 - **Answer:** Yes, providers are encouraged to email J15HHProbeandEducation@CGSadmin.com with any questions or concerns. CGS has completed 383 post probe 1:1 provider calls through March 31, 2019.

- **Question:** If an agency appeals TPE Round 1 results, are they getting their determinations prior to Round 2 or subsequent rounds?
 - **Answer:** The provider has 120 days to file a first level Redetermination appeal. The provider round does not get delayed due to impending appeal decisions.
- **Question:** Should providers request education if they are successful with Round 1?
 - **Answer:** CGS encourages all providers to request education.
- **Question:** Is TPE ongoing or is there an end date?
 - **Answer:** CMS has not issued an end date for TPE.
- **Question:** Is there a process in place for TPE non-responders?
 - **Answer:** Non-responses are tracked and referrals may be made as appropriate.
- **2019 MSI**, <https://www.cgsmedicare.com/j15msi> - Our Provider Customer Service Program Director, Kenyon Floyd, visited with the group and discussed the importance of the MAC Satisfaction Indicator (MSI) Survey. Kenyon disseminated postcards with the link for the 2019 MSI and asked group members to participate and share the survey link.
- **MM11081: Home Health (HH) Patient-Driven Groupings Model (PDGM) - Split Implementation**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM11081.pdf> - With the implementation of PDGM slated for January 2020, POE is working to develop education and resources. The group was asked for recommendations and stated the sooner education starts, the better. Members suggested the following topics are of greatest concern to providers based on recent feedback: Community vs institutional referrals/payment, periods of care vs episode billing, and OASIS interfacing. Concerning OASIS, Betty Metz (CO) advised there are current known issues regarding OASIS D and some vendors are reporting fatal errors. The group suggested a PDGM cheat sheet. Nykesha informed the group POE is meeting at least monthly to develop similar resources as well as working with the other MACs to develop some PDGM related FAQs. CMS has also advised future directives are forth coming.
- **SE19005: What New Home Health Agencies (HHAs) Need to Know About Being Placed in a Provisional Period of Enhanced Oversight**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/SE19005.pdf> - Nykesha confirmed group members were aware of SE19005 and its implications.
 - **Question:** Is there a more definitive time frame for suppression of new HHAs?
 - **Answer:** A provisional period of enhanced oversight for a new HHA can last from 30 days to 1 year. CMS will determine the length of the period of enhanced oversight for each new HHA.
- **Physician Assistants (PAs)/Hospice Attending Physicians Discussion**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM10517.pdf> - Sandy reminded the group PAs are now allowed to act as attending physicians in hospice if so chosen by the beneficiary or their representative. However, PAs can't sign the certification, nor are they allowed to perform the F2F in hospice as they are in home health. One group member added there seems to be confusion on part of the hospice surveyors concerning this issue.
 - **Question:** Would regulations allow for virtual MD to serve as attending physician?
 - **Answer:** Not at this time.
- **MM10967: Redesign of Hospice Periods – Additional Requirements**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM10967.pdf>
- **MM11049: Ensuring Only the Active Hospice Can Submit a Revocation**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM11049.pdf>

- **Hospice Payment Issues Update**, https://www.cgsmedicare.com/hhh/claims/fiss_claims_processing_issues.html - Group was asked to make sure they were aware of these upcoming implementations and if they were hearing of any other hospice issues. The group advised things were quiet for now.
- **MM10983: Common Working File (CWF) Provider Queries National Provider Identifier (NPI) Verification**, <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM10983.pdf> - Both groups were informed of this upcoming implementation and asked to ensure providers are aware. Effective April 2019, NPI verification is required for providers to access eligibility and entitlement data via the CWF provider inquiry screens. Providers may continue to access eligibility/entitlement information with no changes via the web portal, myCGS.
- **New Medicare Card Transition**, <https://www.cms.gov/Medicare/New-Medicare-Card/> - CMS is actively monitoring Medicare Beneficiary Identifier (MBI) transactions and now reporting the MBI adoption rate. We are encouraging all providers to begin transmitting their Medicare transactions with the MBI so they won't be surprised by any issues after the transition ends in January 2020. The group was asked to help us spread this message. CGS will continue to educate on this initiative.
- **EDI Feedback Request**, https://www.cgsmedicare.com/edi_connection/winter_2019.pdf - EDI asked the group for any overall feedback concerning their processes. The only suggestion/recommendation is to convert the FISS/DDE annual recertification to a completely online process. EDI continues to work toward this recommendation.
- **myCGS Recent Enhancements**, <https://www.cgsmedicare.com/hhh/mycgs/index.html> - The myCGS Project Manager, Tammy Hart, visited with the group (refer to slide Nykesha sent on 3/20) and discussed recent and upcoming portal enhancements such as Provider Administrator Account Unlock, MR Section & Secure Messaging, Retrieve Pending Claims (Claims Section), Smart Action Buttons, RAP Comparative Billing Reports (CBRs) and more. Tammy asked the group for suggestions and portal enhancements.

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

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

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

Billing & Claims

- **Updated:** Claims Processing Issues Log (CPIL), https://www.cgsmedicare.com/hhh/claims/fiss_claims_processing_issues.html - Updated with latest reported issues
- **Updated:** Top Claim Submission Errors (Reason Codes) and How to Resolve, <https://www.cgsmedicare.com/hhh/education/materials/cses.html> - Reflects most recent monthly statistics
- **Updated:** Claim Page 01 – Entering a RAP or Claim Web page, https://www.cgsmedicare.com/hhh/education/materials/hhe_claim_page_1.html - Updated to include Rural Add On billing instructions
- **Updated:** Home Health Medicare Billing Codes Sheet Quick Resource Tool (QRT), https://www.cgsmedicare.com/hhh/education/materials/pdf/home_health_billing_codes.pdf - Updated to include Rural Add On billing instructions

Medical Review

- **Updated:** Home Health Top Medical Review Denial Reason Codes, https://www.cgsmedicare.com/hhh/medreview/hh_denial_reasons.html - Includes most recent quarterly data
- **Updated:** Hospice Top Medical Review Denial Reason Codes, https://www.cgsmedicare.com/hhh/medreview/hos_denial_reasons.html - Includes most recent quarterly data

Additional Resources

- **New:** Billing Hospice Physician and Nurse Practitioner (NP) and Physician Assistant (PA) Services (Related to Terminal Diagnosis) QRT, https://cgsmedicare.com/hhh/education/materials/pdf/physician_and_np.pdf - New resource developed in collaboration with Palmetto GBA and NGS
- **New:** Hospice Sequential Billing Reminder: Reason Code 37402 Article, https://www.cgsmedicare.com/hhh/pubs/mb_hhh/2019/j15_hhh_03-19.pdf - POE's area of focus for this year is hospice sequential billing and our efforts revolve on lowering the occurrence rate for Reason Code 37402. As such, this article was developed.
- **New:** Home Health Rural Add-On Payments Based on County of Residence Article, https://www.cgsmedicare.com/hhh/pubs/mb_hhh/2019/j15_hhh_03-19.pdf - Article developed in collaboration with Palmetto GBA and NGS to assist provider with Rural Add On billing instructions implemented in January 2019.
- **New:** CR 10789 Frequently Asked Questions, https://www.cgsmedicare.com/medicare_dynamic/faqs/display_faqs_j15hhh.asp?161 – New category of FAQs dedicated to Change Request 10789 developed
- **New:** Home Health Final Claim Timeliness Calculator Web page, https://www.cgsmedicare.com/medicare_dynamic/j15/rap_final_claim_calc.asp - Based on a POE AG recommendation from Kim Smith (VA), this web page/tool was added to the Claims menu of the Navigation Menu
- **Updated:** Ordering/Referring Physician Checklist for Home Health Agencies QRT, https://www.cgsmedicare.com/hhh/education/materials/pdf/ord_ref_phys_checklist_hha.pdf - Now includes new specialties that may order/refer based on recent CMS directives
- **Updated:** HHH Recorded Webinars, https://www.cgsmedicare.com/hhh/education/recorded_webinars.html - Providers encouraged to visit this page for past events, updated after each educational webinar/teleconference.

Theresa Forster (NAHC) recommended a Change of Contact Form be developed to make certain the MAC has the most up to date contact information for audit and reimbursement purposes. This form was implemented on March 27th and may be accessed at the following link, https://www.cgsmedicare.com/pdf/j15_change_of_contact_form.pdf.

Upcoming CGS Education Events

- Calendar of Events Home Health & Hospice Education Web page, https://www.cgsmedicare.com/medicare_dynamic/wrkshp/pr/HHH_Report.asp - Members were informed of past educational events and future events. Nykesha advised that POE members are available for state and national association meetings to share Medicare updates.

CGS Data Analysis

Claim submission errors (CSEs), MR denials, and CERT data discussed with advisory group members.

NEXT CGS ADVISORY GROUP MEETING

- Please mark your calendars for our next meeting dates:
 - July 9, 2019 – HH POE AG via Teleconference
 - August 13, 2019 – Hospice POE AG via Teleconference
 - December 3, 2019 – HH POE AG via Teleconference
 - December 10, 2019 – Hospice POE AG via Teleconference