Details of the upcoming CGS POE Advisory Group meeting are below, including discussion points for each topic. Please review the topics and any attachments for discussion and identification of provider education needs.

MEETING DETAILS

Date: November 18, 2014
Facilitator: Shonda Brummer, Senior Provider Relations Representative, CGS
Attendees: 14 association representatives

AGENDA ITEMS

Follow-Up Items from June 24, 2014, Hospice Advisory Group Meeting

- Documentation examples for provider education – CGS continues to work on this suggestion. The group suggested that examples of good and bad documentation, including certifications, plans of care, and general inpatient would be helpful. An update will be provided during the next meeting.
- CR 8358 – Infusion pumps hitting reason code W7061 and W7072 – The group was informed that all claims affected by these reason codes have been released for processing. A ListServ message was sent on July 18 to notify providers. The listserv message can be accessed at http://www.cgsmedicare.com/claims/resolved_issues.html.

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

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

- Advance Beneficiary Notice (Occurrence Code 32) Web page, http://www.cgsmedicare.com/hhh/education/materials/ABN_Occurrence_Code_32.html Instructions were added related to the GA modifier to identify those services related to an ABN.
- “Hospice Prescription Drug Reporting Table” quick resource tool, http://www.cgsmedicare.com/hhh/education/materials/pdf/hospice_presdrugreportingtable.pdf This resource was developed cooperatively by the HHH MACs to assist providers with reporting drugs under Change Request (CR) 8358.
CR 8877 – The following are Web pages that were created or updated in response to this CR.

- NEW! Notice of Election Termination/Revocation (NOTR) – 8XB


Education Topics for Group Feedback on Education Needs

- Medicare Secondary Payer – Group feedback was requested on whether it would be helpful to receive information about the 5010 loops and segments required for MSP claims. Members advised they will solicit feedback from billing staff and provide feedback to Shonda.

- CR 8877
  - The group expressed concerns that Common Working File (CWF) is not able to track a hospice discharge and readmission that occurs in a short period of time, and results in an NOE that cannot process. The group was advised that CGS is aware of this issue, and our education has informed providers of the need to still submit an NOE timely, despite knowing it will not process because of the open period. This will support a provider’s request for exception.
  - The group also suggested that an article be published to encourage hospices to establish a quality assurance program which stresses the importance of checking beneficiary eligibility and verifying accuracy of information submitted on the notices of election to reduce provider risk of NOEs being returned, resulting in an untimely NOE. An article will be drafted and published in a future Bulletin.
- The group agreed that a quick resource tool, identifying the steps to submit an NOE and the required fields and data, would be helpful, particularly with non-billers now being required to submit NOEs due to the new timely filing requirements. This tool will be developed and sent to Advisory Group members for feedback.

- The group identified issues related to notices of termination/revocation (NOTRs) not processing when the discharge/revocation is for a future benefit period. The group believes that verbiage from CMS would be helpful to educate providers on this issue. This feedback will be shared with CMS.

- **Attending Physician on Election Statements/Notices of Election (NOEs)** - The group was informed that the FY 2015 Hospice Final Rule provided instructions about identifying the attending physician on the Election Statement; however, CGS must wait for final instructions from CMS, in the form of a Change Request, before education and implementation can occur. Updates will be provided at the next Hospice Advisory Group meeting.

### Upcoming CGS Education Events

- Future education events will be posted to the “Calendar of Events Home Health & Hospice Education” Web page, [http://www.cgsmedicare.com/hhh/education/Education.html](http://www.cgsmedicare.com/hhh/education/Education.html)

### CGS Data Analysis

- Claims submission data, Claim Submission Errors (CSEs) and Top Medical Review Denial Data were distributed to the group and reviewed.
  - A top CSE is duplicate claims (reason code 38200). The group suggested that data be pulled to identify the top providers contributing to this reason code, and send education letters. CGS will pursue this suggestion and an update will be provided during the next meeting.
  - The group felt that the recommendation to provide examples of good/bad documentation will help reduce errors related to the top denial reason, six-month terminal prognosis not supported. This error will continue to be monitored.
  - To address errors when no response to an additional development request (ADR) was received, the group was informed that CGS sends provider education letters to providers, when referred by Medical Review. The group thought this would be helpful.
  - No additional suggestions or feedback was received from the group.

### Open Discussion

- **Attending Physicians** – A member raised the topic of issues with attending physicians, particularly when a hospice patient is seen by a hospitalist while in an inpatient facility, and the hospitalist wants to be the attending physician, and cases were there is a change in attending physician during a patient’s hospice stay and how those situations are handled. CGS and CMS are aware of the hospice industry’s concerns surrounding this issue, and efforts to issue some clarifying language are expected in the future. Once clarification has been received from CMS, CGS will notify providers and solicit feedback from the advisory group on education needs related to this topic.

### Next CGS Advisory Group Meeting

- The next Hospice AG meeting is scheduled for March 17, 2015, from 9:30 a.m. - 11:30 a.m. (Central Time). A meeting was also tentatively scheduled for June 16, 2015.