

## Eli's Hospice Insider

## Eligibility: Make Note of Signs, Symptoms, and Measures of Disease Progression

Prepare for medical review of long stay patients.

Now's the time to tune up your documentation for patients on service longer than 180 days. The **Centers for Medicare** & **Medicaid Services** is giving hospice providers a heads-up that they will be looking more closely at these patients.

In addition to the new face-to-face encounter and attestation requirements, "the Secretary of Health and Human Services [will] conduct medical reviews of all long-stay patients (patients who stay more than 180 days) served by hospices with a high percentage of these patients," says the **National Association for Home Care and Hospice** (NAHC) in a recent member update. These requirements are based on recommendations from the Medicare Payment Advisory Commission in 2009.

Hospices with patients on service longer than six months will need to have thorough documentation, says **Beth Carpenter**, president of **Beth Carpenter and Associates** in Lake Barrington, III. She suggests asking three questions about each potential hospice patient:

- 1. Is this patient hospice-eligible?
- 2. Is this patient hospice-appropriate? In other words, is the patient ready to embrace the hospice care philosophy?
- 3. Are you appropriately documenting the signs, symptoms, and measurement of the patient's disease?

On your toes: Hospices with a large number of long length of stay patients need to know that these patients may be medically reviewed, Carpenter says.

Exactly what hospices must do to remain compliant with the proposed regulations is unclear, NAHC points out, urging members to submit comments to be included with the organizations response to the proposed rule.

NAHC members can email comments to Theresa Forster at tmf@nahc.org by Wednesday, Sept. 1.