



## Additional Audit Response Information

- Submit documentation for the dates of service under review on time and in an organized manner. If deadline is missed, it is an automatic denial.
- Bates stamp (or number) all pages submitted. Retain a duplicate copy for the hospice.
- If sending by mail, request tracking and receipt confirmation. If electronically submitted, print receipt confirmation.
- Keep an exact copy of all documentation submitted with each ADR.
- Consider drafting a cover letter with the response (can be done by the Hospice or an independent expert)
- Consider including documentation just prior to or after the dates of service under review to further substantiate clinical eligibility
- Highlight important items; however, do not alter the clinical record
- Include scholarly articles, if needed
- Track all TPE activity (EXCEL works well) and reasons for denial
- Take advantage of the MAC education during the TPE process – ask challenging questions, if needed.
- If clinical record remediation is needed, consult legal counsel
- Educate staff on clinical record deficiencies and how to mitigate future payment denial (technical and/or clinical)
- If there are payment-related problems, put an Action Plan in place ASAP to fix them!
  - Incorporate into QAPI program and/or Compliance Plan
  - Action Plan should be written and followed
  - Maintain documentary evidence of all Action Plan steps, audit results, outcome improvement, etc.
- Make prudent appeal decisions

## REFERENCES

- *2019 Medicare Fee-for-Service Supplemental Improper Payment Data*. U.S. Department of Health & Human Services.  
<https://www.cms.gov/files/document/2019-medicare-fee-service-supplemental-improper-payment-data.pdf>
- *Vulnerabilities in the Medicare Hospice Program Affect Quality Care and Program Integrity: An OIG Portfolio*. July 2018.  
<https://oig.hhs.gov/oei/reports/oei-02-16-00570.pdf>
- *Hospice Deficiencies Pose Risks to Medicare Beneficiaries*. Office of Inspector General. July 2019.  
[https://oig.hhs.gov/oei/reports/oei-02-17-00020.pdf?utm\\_source=summary-page&utm\\_medium=web&utm\\_campaign=OEI-02-17-00020-PDF](https://oig.hhs.gov/oei/reports/oei-02-17-00020.pdf?utm_source=summary-page&utm_medium=web&utm_campaign=OEI-02-17-00020-PDF)