

## *Post-Boot Camp Checklist*

**Hospice** \_\_\_\_\_  
**Name** \_\_\_\_\_  
**Date** \_\_\_\_\_

☐	ACTIVITY	COMMENTS
<b>CONDUCT A “DESK REVIEW” OF ALL SIGN-ON FORMS/TEMPLATES</b>		
	The <i>Notice of Election / Election of Benefits</i> form contains all required elements	
	The <u>attending physician</u> <i>Initial Certification of Terminal Illness</i> form contains all required elements, including the placement of said elements on the form	
	The <u>hospice physician</u> <i>Initial Certification of Terminal Illness</i> form contains all required elements, including the placement of said elements on the form	
	The <i>Recertification of Terminal Illness</i> form contains all required elements, including the placement of said elements on the form	
	The <i>Physician Narrative</i> form/template contains all required elements, including the correct attestation language and the placement of all required elements on the form/template	
	The <u>physician</u> <i>Face to Face Encounter</i> form/template contains all required elements, including the correct attestation language and the placement of all required elements on the form/template	
	The <u>nurse practitioner</u> <i>Face-to-Face Encounter</i> form/template contains all required elements, including the correct	

☐	ACTIVITY	COMMENTS
	attestation language and the placement of all required elements on the form/template	
	The <i>Plan of Care</i> form/template contains all required elements	
	All forms/templates contain a revision date, and keep historical archives	
	Historical archives of all forms/templates are maintained	
	All outdated forms/templates are immediately and completely removed from circulation (e.g., storage areas, desk drawers, filing cabinets, staff cars, pre-made “packets”, etc.)	

□	ACTIVITY	COMMENTS
<b>CLINICAL RECORD AUDITING</b>		
	Develop and implement a process for conducting all clinical record audits on a <b>pre-billing</b> basis	
	Develop and implement a clinical record audit tool to evaluate compliance with all “technical” (i.e., billing-related) requirements	
	Develop and implement a clinical record audit tool to evaluate whether physician and interdisciplinary documentation supports “medical necessity” (i.e., prognosis of 6 months or less if the terminal illness runs its normal course)	
	Develop and implement a clinical record audit tool to evaluate whether documentation associated with higher levels of care (i.e., general inpatient care and continuous home care) fulfill the <i>needed</i> and <i>provided</i> requirement, and justify payment	
	Develop and implement a clinical record audit tool to evaluate compliance with the CoPs	
	Ensure that the “technical” clinical record audit tools are updated with any applicable regulatory changes, including the effective dates	
	Ensure that the “medical necessity” clinical record audit tools are updated with any changes to Local Coverage Determination (LCD) guidelines	
	Ensure that the higher levels of care clinical record audit tools are updated with any applicable regulatory changes, including the effective dates	
	Ensure that the CoPs clinical record audit tool is updated with any applicable regulatory changes, including the effective dates	

□	ACTIVITY	COMMENTS
	Develop an audit protocol and train all auditing staff regarding the proper use of the audit tools	
	<p>If auditing clinical records associated with <b><u>previously billed claims</u></b>:</p> <ul style="list-style-type: none"> <li>• Consider engaging an attorney and conducting audits under “attorney-client privilege”</li> <li>• Discuss your concerns with counsel (e.g., why you want to audit previously billed claims, etc.)</li> <li>• Strategized with counsel regarding the audit, its findings, and any required actions (e.g., self-disclosure and repayment, etc.)</li> <li>• Identify the relevant time frame (i.e., dates of service to be audited)</li> <li>• Establish an appropriate audit sample (e.g., sample size, selection criteria, random vs. RAT-STAT, etc.)</li> <li>• Create an appropriate audit tool (e.g., ensure that the “then-current” regulatory requirements and effective dates are reflected in the audit tool, etc.)</li> <li>• Develop an audit protocol and train all auditing staff regarding the proper use of the audit tools</li> <li>• Determine whether the dates of service and/or sample need to be expanded based on audit findings</li> </ul>	