

Questions and Answers from Open Door Forum: Home Health, Hospice and DME- January 8, 2020

1. My question is, the OASIS submissions and iQIES system, we know that non-PDGM HIPPS Codes are being allowed to be used for Medicare Advantage in similar payers. Are non-PDGM HIPPS Codes being accepted by the iQIES system if they are submitted on the OASIS? Do you want an assessment for a non-PDGM payer and if they are being accepted are they being stored in the system for OASIS and claim validation where the Medicare Advantage payer may want to match insured matching?
 - a. The HIPPS Codes are not required after January 1, 2020 so the iQIES will not be doing validations on those items so they will not be in fact saving them because they are not required. They will be ignoring them -- because as of January 1 we had no authority to collect that data.
 - i. Right. We were just thinking that, you know, Medicare Advantage payers or any similar other payer may be doing something like that on their own outside of, you know the traditional Medicare fee for service.
 1. To my knowledge we don't have any MA payers that are doing claims OASIS validation at least not in any systematic way.
2. You mentioned that the Web site for the Q&A for OASIS that's coming out January 31 was on the agenda but I didn't see the Web site on the agenda.
 - a. <https://qtso.cms.gov/providers/home-health-agency-hha-providers/reference-manuals>
3. Is the first visit date still required before that subsequent 30-day wrap is sent?
 - a. Yes, it is except in this sort of limited circumstance where there are cases where there is no visit expected during that 30-day period. But yes, the actual visit date for the first visit in the period is a requirement on all of the wraps.
4. My question is regarding the QRP Program. Could you please repeat with the January 2020 refresh that the rehospitalization and the first 30 days is no longer going to be reported. Would you please confirm?
 - a. I'm confirming. It will no longer be reported.
5. I wanted to know when you contact the iQIES either by way of phone or by email is there a certain amount of time for turnaround response? I called them today and their mailbox is full and I have sent them two emails.
 - a. We recognize that there has been - there is long wait times for responses. The offset was affording the ability to decrease those and hopefully get a response A-S-A-P. We don't necessarily have a service bubble agreement in terms of the predicated time they need to get back to them. But we are aware and we are working on that as diligently as possible.
6. I have a question regarding iQIES and we are having consistent reductions in assessments that have been modified and sent through the new iQIES system where the original assessment was submitted in and accepted through the legacy system. Is this a known

issue or is that being worked on and we have not been able to get through iQIES to verify that?

- a. That is a known issue and they are actively working on that to correct that issue.
7. But what would we do on our end with those records that are having a problem? Should we try to modify them a second time and send them back through up. We know there is nothing wrong compared to the legacy system. What would our fix be to get the records accepted?
 - a. Don't do anything. Resubmitting it will just go and turn another rejection at this point so that's my knowledge. So hold tight with those records until you see some sort of communication coming out with respect to the fix. And as soon as that is available the community at large will be notified that you are now green lighted to submit those modified records.
8. My question is in regards to iQIES as well. I'm wondering if there is any centralized area that providers or vendors can find to go status on open issues that are reported about iQIES and their resolution. I know it's on the (MAC)s but then they claim is processing type issue, they typically have a claims processing log. But we are not aware of any area where known iQIES issues can be found with their resolution.
 - a. That's actually a great solution or a great suggestion. We can certainly take that back to the team. That's a very good suggestion. Thank you. But currently one does not exist.
9. My question/comment is regarding the last gentleman's comment about billing and the iQIE - the ability to not or not being able to submit through iQIES or having the rejections. My understanding is, if we cannot successfully submit an OASIS into iQIES and have it accepted then we cannot submit a bill. So in theory we can't bill. Our bills are being held off.
 - a. Thanks for the clarification. I may have misunderstood what he said. Again we are affording the issue on the modification and rejections and we will notify the community at large as soon as there is a solution in place.
10. This is for iQIES question again and it's a two-part one. You said that the previous question that I had was a known issue. Do you have a listing of other known issues that you could talk about here today at the forum? And then also with the previous questions regarding this concern regarding payment for OASIS that are held up due to the problems. Are we going to be allowed some forgiveness for not getting that assessment in the 30 days?
 - a. I wanted to speak first to the 30-day penalty. That's a warning edit. I don't believe that there is a payment implication related to that. So if your assessment is submitted past the 30-day time period you will receive a warning message on your final validation report. But that late submission in and of itself does not result in a penalty. You are simply notified that the assessment was submitted late. And as far as discussing other known issues, there are other known issues and I don't know if we are prepared, certainly I'm not prepared to and I don't have notes in front of me about those. It goes back to your colleague's question

about one place to get all that. Get great suggestions. Keep your eyes and ears open for communications coming out and, you know, that may be an alternate or downstream solution. So we'll get the information to you as quickly and as efficiently as we possibly can. Thank you for your patience.

11. Now, it's not a condition for payment but it is a condition of participation and I don't believe anybody from survey side is on the call. But this is something that is going to be a concern for agencies if this continues much longer.
 - a. Thank you for the update. Again there is no one here from survey side. You're correct. And we'll double check on that on this end.