
Program Memorandum Intermediaries

Department of Health and
Human Services (DHHS)
HEALTH CARE FINANCING
ADMINISTRATION (HCFA)

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Date: JULY 27, 2000

CHANGE REQUEST 1264

**SUBJECT: Transition to the Home Health Prospective Payment System (HHPPS)--
INFORMATION**

Effective October 1, 2000, all Medicare home health services provided under a physician's plan of care will be paid under the HHPPS. Instructions for provider billing and intermediary claims processing are contained in Program Memorandum (PM) AB-00-65 and in revisions to the Medicare Intermediary Manual, Part 3 and the Home Health Agency (HHA) Manual. This PM is to provide information for providers specific to the transition to HH PPS. This information, which is applicable for a limited period of time, will not be reflected in revisions to Health Care Financing Administration (HCFA) manuals.

Inform your providers of the following in your next regularly scheduled provider bulletin, but no later than August 31, 2000.

Advent of the HHPPS--Change in the Unit of Payment

The HHPPS changes the basis of payment for home health services for homebound Medicare beneficiaries under a plan of care. The unit of payment changes from cost reimbursed visits to a 60 day episode period. Transition between these payment systems requires certain procedures to be followed for development of plans of care and Outcome and Assessment Information Set (OASIS) assessments, and submission of claims and cost reports. These procedures are described below.

1. Plan of Care and OASIS Assessment Grace Periods

HCFA is providing a one-time implementation grace period for OASIS assessments and plan of care certifications to alleviate transition concerns associated with all HHAs starting PPS with the same effective date of October 1, 2000.

Plan of Care Certifications:

For established home health beneficiaries as of September 1, 2000, we are providing a one-time grace period that provides a certification period up to a maximum of 90 days (September 1, 2000 through and including November 29, 2000). HHAs, in conjunction with a certifying physician, may have a one-time maximum 90-day plan of care certification. The regulatory requirements governing the Medicare home health benefit before PPS would apply to the certification period up to and including September 30, 2000. The plan of care must reflect a statistical break between the pre-HHPPS physician ordered services (September 1, 2000 through September 30, 2000) and the post-HHPPS physician ordered services (October 1, 2000 through November 29, 2000). Included in the statistical break is the notation of the start of care date/first billable visit date for this beneficiary under HHPPS.

| Physician Certification | |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Cert. date earlier than 09/01/2000? | One-time additional recertification of the Plan of Care before 10/01/2000 |
| Cert. date after 09/01/2000? | Recertification date from earlier version of the Plan of Care may be used if it falls between 09/01 and 09/30. |

OASIS Schedule Grace Periods for Beneficiaries under an Established Plan of Care:

For the period of September 1, 2000, through September 30, 2000, HHAs may use the most recent OASIS start of care or follow-up to group for case mix. HHAs must complete this assessment using the new OASIS B-1 (8/2000) data set and encode it using the HAVEN 4.0 software (or other HAVEN-like vendor software). For the period of August 1, 2000, through August 31, 2000, it is at the HHA's discretion to complete the next scheduled assessment any day September 2000 to group for case mix. These assessment periods will be allowed to extend to the conclusion of the each beneficiary's first episode of care under HHPPS, from any day in September 2000 up to and including, but not beyond November 29, 2000. At the conclusion of each beneficiary's first episode of care, HHAs will resume OASIS requirements governing re-assessment during the last 5 days of the episode certification period.

| OASIS Start of Care or Follow-Up | |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| OASIS completed earlier than 09/01/2000? | One-time additional follow-up OASIS during September |
| OASIS completed after 09/01/2000? | No additional follow-up OASIS required; earlier OASIS assessment (i.e., occurring between 09/01 and 09/30) can be used |

2. Claims Submission to Reflect the Transition to HHPPS

HHPPS is effective for all home health providers simultaneously on October 1, 2000. There will be no transition by cost reporting period. This means that providers must bill services provided on or before September 30, 2000, on claims separate from those with service on or after October 1, 2000. Claims for all services provided on or before September 30, 2000, will be paid under the Interim Payment System (IPS). Claims for all services provided on or after October 1, 2000, will be paid under HHPPS. No claims may be submitted with dates of service spanning September and October 2000 dates. For all beneficiaries who continue to receive services on or after October 1, 2000, requests for anticipated payment (RAPs) may be submitted to receive an initial percentage payment for those beneficiaries under HHPPS.

Even though these beneficiaries will have been admitted earlier, report October 1, 2000, as the admission date on these first HHPPS RAPs and claims. This one-time artificial reporting of the admission date will not be considered a false claim. It is important that all dates on RAPs and HHPPS claims are on or after October 1, 2000, since Medicare systems will process under the HHPPS or the IPS based on dates of service.

Regional Home Health Intermediaries (RHHIs) will continue to maintain parallel claims processing logic for IPS and HHPPS claims for the entire Medicare timely filing period. Claims and adjustments submitted on or after October 1, 2000, for dates of service on or before September 30, 2000, will continue to be paid under the IPS. HHAs that have been billing under the HHPPS demonstration project will also continue to have claims and adjustments for dates of service on or before September 30, 2000, processed and paid under the demonstration methodology for the entire Medicare timely filing period.

3. Health Insurance Prospective Payment System (HIPPS) Codes for Federal Fiscal Year 2001

As the HIPPS codes may change in future years of the HHPPS to reflect refinements to the case-mix system or other payment methodology refinements, a list of HIPPS codes will be published annually in a PM for use in the upcoming fiscal year.

A coding scheme has been developed that reflects the 80 home health resource groups (HHRGs) as 640 home 5-position, alpha-numeric home health HIPPS codes. The first position of every home health HIPPS code will be 'H'. The second, third, and fourth positions of the code will crosswalk to the HHRG system as published in the HHPPS final rule. These positions will only allow alphabetic characters.

The fifth position will indicate which elements of the code were computed (output from the Grouper based on complete OASIS data) or derived (output from the Grouper based on a system of defaults where OASIS data is incomplete). The fifth position will only allow numeric characters.

The HHRG system is published in the HHPPS final rule with identifiers that express the payment groups in terms of the clinical, functional and service domains of the OASIS. For instance, the minimum score in all three domains was represented by an identifier of C0F0S0.

The following chart demonstrates how HIPPS codes are structured and crosswalks these HHRG identifiers to the HIPPS codes as well:

| (Clinical) Position #2 | (Functional) Position #3 | (Service) Position #4 | Position #5 | Domain Level |
|---------------------------------------|-----------------------------------------|--------------------------------------|----------------------------------------------|---------------------------------|
| A (C0) | E (F0) | J (S0) | 1 = 2nd, 3rd & 4th positions computed | = min |
| B (C1) | F (F1) | K (S1) | 2 = 2nd position derived | = low |
| C (C2) | G (F2) | L (S2) | 3 = 3rd position derived | = mod |
| D (C3) | H (F3) | M (S3) | 4 = 4th position derived | = high |
| | I (F4) | | 5 = 2nd & 3rd positions derived | = max |
| | | | 6 = 3rd & 4th positions derived | |
| | | | 7 = 2nd & 4th positions derived | |
| | | | 8 = 2nd, 3rd & 4th positions derived | |
| | | N through Z | 9, 0 | expansion values for future use |

Using this coding structure, the 80 HHRGs are presented for Federal fiscal year 2001 by the following 640 HIPPS codes:

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-----------------------------------------|------------------------|
| HAEJ1 HAEJ2 HAEJ3 HAEJ4 HAEJ5 HAEJ6 HAEJ7 HAEJ8 | Clinical=Min,Functional=Min,Service=Min | C0F0S0 |
| HAEK1 HAEK2 HAEK3 HAEK4 HAEK5 HAEK6 HAEK7 HAEK8 | Clinical=Min,Functional=Min,Service=Low | C0F0S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HAEL1 HAEL2 HAEL3 HAEL4 HAEL5 HAEL6 HAEL7 HAEL8 | Clinical=Min,Functional=Min,Service=Mod | C0F0S2 |
| HAEM1 HAEM2 HAEM3 HAEM4 HAEM5 HAEM6 HAEM7 HAEM8 | Clinical=Min,Functional=Min,Service=High | C0F0S3 |
| HAFJ1 HAFJ2 HAFJ3 HAFJ4 HAFJ5 HAFJ6 HAFJ7 HAFJ8 | Clinical=Min,Functional=Low,Service=Min | C0F1S0 |
| HAFK1 HAFK2 HAFK3 HAFK4 HAFK5 HAFK6 HAFK7 HAFK8 | Clinical=Min,Functional=Low,Service=Low | C0F1S1 |
| HAFL1 HAFL2 HAFL3 HAFL4 HAFL5 HAFL6 HAFL7 HAFL8 | Clinical=Min,Functional=Low,Service=Mod | C0F1S2 |
| HAFM1 HAFM2 HAFM3 HAFM4 HAFM5 HAFM6 HAFM7 HAFM8 | Clinical=Min,Functional=Low,Service=High | C0F1S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HAGJ1 HAGJ2 HAGJ3 HAGJ4 HAGJ5 HAGJ6 HAGJ7 HAGJ8 | Clinical=Min,Functional=Mod,Service=Min | C0F2S0 |
| HAGK1 HAGK2 HAGK3 HAGK4 HAGK5 HAGK6 HAGK7 HAGK8 | Clinical=Min,Functional=Mod,Service=Low | C0F2S1 |
| HAGL1 HAGL2 HAGL3 HAGL4 HAGL5 HAGL6 HAGL7 HAGL8 | Clinical=Min,Functional=Mod,Service=Mod | C0F2S2 |
| HAGM1 HAGM2 HAGM3 HAGM4 HAGM5 HAGM6 HAGM7 HAGM8 | Clinical=Min,Functional=Mod,Service=High | C0F2S3 |
| HAHJ1 HAHJ2 HAHJ3 HAHJ4 HAHJ5 HAHJ6 HAHJ7 HAHJ8 | Clinical=Min,Functional=High,Service=Min | C0F3S0 |
| HAHK1 HAHK2 HAHK3 HAHK4 HAHK5 HAHK6 HAHK7 HAHK8 | Clinical=Min,Functional=High,Service=Low | C0F3S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-------------------------------------------|------------------------|
| HAHL1 HAHL2 HAHL3 HAHL4 HAHL5 HAHL6 HAHL7 HAHL8 | Clinical=Min,Functional=High,Service=Mod | C0F3S2 |
| HAHM1 HAHM2 HAHM3 HAHM4 HAHM5 HAHM6 HAHM7 HAHM8 | Clinical=Min,Functional=High,Service=High | C0F3S3 |
| HAIJ1 HAIJ2 HAIJ3 HAIJ4 HAIJ5 HAIJ6 HAIJ7 HAIJ8 | Clinical=Min,Functional=Max,Service=Min | C0F4S0 |
| HAIK1 HAIK2 HAIK3 HAIK4 HAIK5 HAIK6 HAIK7 HAIK8 | Clinical=Min,Functional=Max,Service=Low | C0F4S1 |
| HAIL1 HAIL2 HAIL3 HAIL4 HAIL5 HAIL6 HAIL7 HAIL8 | Clinical=Min,Functional=Max,Service=Mod | C0F4S2 |
| HAIM1 HAIM2 HAIM3 HAIM4 HAIM5 HAIM6 HAIM7 HAIM8 | Clinical=Min,Functional=Max,Service=High | C0F4S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HBEJ1 HBEJ2 HBEJ3 HBEJ4 HBEJ5 HBEJ6 HBEJ7 HBEJ8 | Clinical=Low,Functional=Min,Service=Min | C1F0S0 |
| HBEK1 HBEK2 HBEK3 HBEK4 HBEK5 HBEK6 HBEK7 HBEK8 | Clinical=Low,Functional=Min,Service=Low | C1F0S1 |
| HBEL1 HBEL2 HBEL3 HBEL4 HBEL5 HBEL6 HBEL7 HBEL8 | Clinical=Low,Functional=Min,Service=Mod | C1F0S2 |
| HBEM1 HBEM2 HBEM3 HBEM4 HBEM5 HBEM6 HBEM7 HBEM8 | Clinical=Low,Functional=Min,Service=High | C1F0S3 |
| HBFJ1 HBFJ2 HBFJ3 HBFJ4 HBFJ5 HBFJ6 HBFJ7 HBFJ8 | Clinical=Low,Functional=Low,Service=Min | C1F1S0 |
| HBFK1 HBFK2 HBFK3 HBFK4 HBFK5 HBFK6 HBFK7 HBFK8 | Clinical=Low,Functional=Low,Service=Low | C1F1S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HBFL1 HBFL2 HBFL3 HBFL4 HBFL5 HBFL6 HBFL7 HBFL8 | Clinical=Low,Functional=Low,Service=Mod | C1F1S2 |
| HBFM1 HBFM2 HBFM3 HBFM4 HBFM5 HBFM6 HBFM7 HBFM8 | Clinical=Low,Functional=Low,Service=High | C1F1S3 |
| HBGJ1 HBGJ2 HBGJ3 HBGJ4 HBGJ5 HBGJ6 HBGJ7 HBGJ8 | Clinical=Low,Functional=Mod,Service=Min | C1F2S0 |
| HBGK1 HBGK2 HBGK3 HBGK4 HBGK5 HBGK6 HBGK7 HBGK8 | Clinical=Low,Functional=Mod,Service=Low | C1F2S1 |
| HBGL1 HBGL2 HBGL3 HBGL4 HBGL5 HBGL6 HBGL7 HBGL8 | Clinical=Low,Functional=Mod,Service=Mod | C1F2S2 |
| HBGM1 HBGM2 HBGM3 HBGM4 HBGM5 HBGM6 HBGM7 HBGM8 | Clinical=Low,Functional=Mod,Service=High | C1F2S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-------------------------------------------|------------------------|
| HBHJ1 HBHJ2 HBHJ3 HBHJ4 HBHJ5 HBHJ6 HBHJ7 HBHJ8 | Clinical=Low,Functional=High,Service=Min | C1F3S0 |
| HBHK1 HBHK2 HBHK3 HBHK4 HBHK5 HBHK6 HBHK7 HBHK8 | Clinical=Low,Functional=High,Service=Low | C1F3S1 |
| HBHL1 HBHL2 HBHL3 HBHL4 HBHL5 HBHL6 HBHL7 HBHL8 | Clinical=Low,Functional=High,Service=Mod | C1F3S2 |
| HBHM1 HBHM2 HBHM3 HBHM4 HBHM5 HBHM6 HBHM7 HBHM8 | Clinical=Low,Functional=High,Service=High | C1F3S3 |
| HBIJ1 HBIJ2 HBIJ3 HBIJ4 HBIJ5 HBIJ6 HBIJ7 HBIJ8 | Clinical=Low,Functional=Max,Service=Min | C1F4S0 |
| HBIK1 HBIK2 HBIK3 HBIK4 HBIK5 HBIK6 HBIK7 HBIK8 | Clinical=Low,Functional=Max,Service=Low | C1F4S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HBIL1 HBIL2 HBIL3 HBIL4 HBIL5 HBIL6 HBIL7 HBIL8 | Clinical=Low,Functional=Max,Service=Mod | C1F4S2 |
| HBIM1 HBIM2 HBIM3 HBIM4 HBIM5 HBIM6 HBIM7 HBIM8 | Clinical=Low,Functional=Max,Service=High | C1F4S3 |
| HCEJ1 HCEJ2 HCEJ3 HCEJ4 HCEJ5 HCEJ6 HCEJ7 HCEJ8 | Clinical=Mod,Functional=Min,Service=Min | C2F0S0 |
| HCEK1 HCEK2 HCEK3 HCEK4 HCEK5 HCEK6 HCEK7 HCEK8 | Clinical=Mod,Functional=Min,Service=Low | C2F0S1 |
| HCEL1 HCEL2 HCEL3 HCEL4 HCEL5 HCEL6 HCEL7 HCEL8 | Clinical=Mod,Functional=Min,Service=Mod | C2F0S2 |
| HCEM1 HCEM2 HCEM3 HCEM4 HCEM5 HCEM6 HCEM7 HCEM8 | Clinical=Mod,Functional=Min,Service=High | C2F0S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HCFJ1 HCFJ2 HCFJ3 HCFJ4 HCFJ5 HCFJ6 HCFJ7 HCFJ8 | Clinical=Mod,Functional=Low,Service=Min | C2F1S0 |
| HCFK1 HCFK2 HCFK3 HCFK4 HCFK5 HCFK6 HCFK7 HCFK8 | Clinical=Mod,Functional=Low,Service=Low | C2F1S1 |
| HCFL1 HCFL2 HCFL3 HCFL4 HCFL5 HCFL6 HCFL7 HCFL8 | Clinical=Mod,Functional=Low,Service=Mod | C2F1S2 |
| HCFM1 HCFM2 HCFM3 HCFM4 HCFM5 HCFM6 HCFM7 HCFM8 | Clinical=Mod,Functional=Low,Service=High | C2F1S3 |
| HCGJ1 HCGJ2 HCGJ3 HCGJ4 HCGJ5 HCGJ6 HCGJ7 HCGJ8 | Clinical=Mod,Functional=Mod,Service=Min | C2F2S0 |
| HCGK1 HCGK2 HCGK3 HCGK4 HCGK5 HCGK6 HCGK7 HCGK8 | Clinical=Mod,Functional=Mod,Service=Low | C2F2S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-------------------------------------------|------------------------|
| HCGL1 HCGL2 HCGL3 HCGL4 HCGL5 HCGL6 HCGL7 HCGL8 | Clinical=Mod,Functional=Mod,Service=Mod | C2F2S2 |
| HCGM1 HCGM2 HCGM3 HCGM4 HCGM5 HCGM6 HCGM7 HCGM8 | Clinical=Mod,Functional=Mod,Service=High | C2F2S3 |
| HCHJ1 HCHJ2 HCHJ3 HCHJ4 HCHJ5 HCHJ6 HCHJ7 HCHJ8 | Clinical=Mod,Functional=High,Service=Min | C2F3S0 |
| HCHK1 HCHK2 HCHK3 HCHK4 HCHK5 HCHK6 HCHK7 HCHK8 | Clinical=Mod,Functional=High,Service=Low | C2F3S1 |
| HCHL1 HCHL2 HCHL3 HCHL4 HCHL5 HCHL6 HCHL7 HCHL8 | Clinical=Mod,Functional=High,Service=Mod | C2F3S2 |
| HCHM1 HCHM2 HCHM3 HCHM4 HCHM5 HCHM6 HCHM7 HCHM8 | Clinical=Mod,Functional=High,Service=High | C2F3S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|------------------------------------------|------------------------|
| HCIJ1 HCIJ2 HCIJ3 HCIJ4 HCIJ5 HCIJ6 HCIJ7 HCIJ8 | Clinical=Mod,Functional=Max,Service=Min | C2F4S0 |
| HCIK1 HCIK2 HCIK3 HCIK4 HCIK5 HCIK6 HCIK7 HCIK8 | Clinical=Mod,Functional=Max,Service=Low | C2F4S1 |
| HCIL1 HCIL2 HCIL3 HCIL4 HCIL5 HCIL6 HCIL7 HCIL8 | Clinical=Mod,Functional=Max,Service=Mod | C2F4S2 |
| HCIM1 HCIM2 HCIM3 HCIM4 HCIM5 HCIM6 HCIM7 HCIM8 | Clinical=Mod,Functional=Max,Service=High | C2F4S3 |
| HDEJ1 HDEJ2 HDEJ3 HDEJ4 HDEJ5 HDEJ6 HDEJ7 HDEJ8 | Clinical=High,Functional=Min,Service=Min | C3F0S0 |
| HDEK1 HDEK2 HDEK3 HDEK4 HDEK5 HDEK6 HDEK7 HDEK8 | Clinical=High,Functional=Min,Service=Low | C3F0S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-------------------------------------------|------------------------|
| HDEL1 HDEL2 HDEL3 HDEL4 HDEL5 HDEL6 HDEL7 HDEL8 | Clinical=High,Functional=Min,Service=Mod | C3F0S2 |
| HDEM1 HDEM2 HDEM3 HDEM4 HDEM5 HDEM6 HDEM7 HDEM8 | Clinical=High,Functional=Min,Service=High | C3F0S3 |
| HDFJ1 HDFJ2 HDFJ3 HDFJ4 HDFJ5 HDFJ6 HDFJ7 HDFJ8 | Clinical=High,Functional=Low,Service=Min | C3F1S0 |
| HDFK1 HDFK2 HDFK3 HDFK4 HDFK5 HDFK6 HDFK7 HDFK8 | Clinical=High,Functional=Low,Service=Low | C3F1S1 |
| HDFL1 HDFL2 HDFL3 HDFL4 HDFL5 HDFL6 HDFL7 HDFL8 | Clinical=High,Functional=Low,Service=Mod | C3F1S2 |
| HDFM1 HDFM2 HDFM3 HDFM4 HDFM5 HDFM6 HDFM7 HDFM8 | Clinical=High,Functional=Low,Service=High | C3F1S3 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|-------------------------------------------|------------------------|
| HDGJ1 HDGJ2 HDGJ3 HDGJ4 HDGJ5 HDGJ6 HDGJ7 HDGJ8 | Clinical=High,Functional=Mod,Service=Min | C3F2S0 |
| HDGK1 HDGK2 HDGK3 HDGK4 HDGK5 HDGK6 HDGK7 HDGK8 | Clinical=High,Functional=Mod,Service=Low | C3F2S1 |
| HDGL1 HDGL2 HDGL3 HDGL4 HDGL5 HDGL6 HDGL7 HDGL8 | Clinical=High,Functional=Mod,Service=Mod | C3F2S2 |
| HDGM1 HDGM2 HDGM3 HDGM4 HDGM5 HDGM6 HDGM7 HDGM8 | Clinical=High,Functional=Mod,Service=High | C3F2S3 |
| HDHJ1 HDHJ2 HDHJ3 HDHJ4 HDHJ5 HDHJ6 HDHJ7 HDHJ8 | Clinical=High,Functional=High,Service=Min | C3F3S0 |
| HDHK1 HDHK2 HDHK3 HDHK4 HDHK5 HDHK6 HDHK7 HDHK8 | Clinical=High,Functional=High,Service=Low | C3F3S1 |

| HIPPS codes | Case Mix Description by Domains | HHRG Identifier |
|----------------------------------------------------------------------|--------------------------------------------|------------------------|
| HDHL1 HDHL2 HDHL3 HDHL4 HDHL5 HDHL6 HDHL7 HDHL8 | Clinical=High,Functional=High,Service=Mod | C3F3S2 |
| HDHM1 HDHM2 HDHM3 HDHM4 HDHM5 HDHM6 HDHM7 HDHM8 | Clinical=High,Functional=High,Service=High | C3F3S3 |
| HDIJ1 HDIJ2 HDIJ3 HDIJ4 HDIJ5 HDIJ6 HDIJ7 HDIJ8 | Clinical=High,Functional=Max,Service=Min | C3F4S0 |
| HDIK1 HDIK2 HDIK3 HDIK4 HDIK5 HDIK6 HDIK7 HDIK8 | Clinical=High,Functional=Max,Service=Low | C3F4S1 |
| HDIL1 HDIL2 HDIL3 HDIL4 HDIL5 HDIL6 HDIL7 HDIL8 | Clinical=High,Functional=Max,Service=Mod | C3F4S2 |
| HDIM1 HDIM2 HDIM3 HDIM4 HDIM5 HDIM6 HDIM7 HDIM8 | Clinical=High,Functional=Max,Service=High | C3F4S3 |

4. Implementation of Consolidated Billing

The Balanced Budget Act of 1997 required consolidated billing of all home health services as defined by §1861(m) of the Social Security Act, with the exception of Durable Medical Equipment (DME), while a beneficiary is under a home health plan of care authorized by a physician. Consequently, payment for all such items and services that occur during a HHPPS episode is to be made to a single HHA, and this HHA is known as the primary agency (or the primary HHA) for HHPPS billing purposes.

The law states payment will be made to the primary HHA without regard as to whether or not the item or service was furnished by the agency, by others under arrangement to the primary agency, or when any other contracting or consulting arrangements exist with the primary agency, or “otherwise”. Payment for all items is included in the HH PPS episode payment the primary HHA receives.

Types of services that are subject to the home health consolidated billing provision:

- o Skilled nursing care;
- o Home health aide services;
- o Physical therapy;
- o Speech-language pathology;
- o Occupational therapy;
- o Medical social services;
- o Routine and non-routine medical supplies;
- o Medical services provided by an intern or resident-in-training of a hospital, under an approved teaching program of the hospital, in the case of a HHA that is affiliated or under common control with that hospital; and
- o Care for homebound beneficiaries involving equipment too cumbersome to take to the home.

The HHA that submits the first RAP or claim successfully processed by Medicare systems will be recorded as the primary HHA for a given episode. This record will be kept in a new episode auxiliary file in HCFA’s Common Working File (CWF) system. If a beneficiary transfers during a 60-day episode, then the transfer HHA that establishes the new plan of care assumes responsibility for consolidating billing for the beneficiary, and is recorded as the primary HHA in CWF.

Fiscal intermediaries (including the RHHIs) and carriers will reject any claims from any provider other than the primary HHA that contain billing for the services and items above when billed for dates of service within a primary HHA’s billing period. This applies to providers types including and beyond HHAs (i.e., outpatient hospital facilities, suppliers and others).

DME is exempt from home health consolidated billing by law. Therefore, DME may be billed by a supplier to a DME Regional Carrier or billed by a HHA to an RHHI, even HHAs other than the primary HHA. Medicare systems will allow either party to submit DME claims, but will ensure that the same DME items are not submitted to both the intermediary and the carrier at the same time for the same beneficiary.

5. New CWF Inquiry System for HHPPS

A new transaction, identified as HIQH (Health Insurance Query for HHAs), will be available as of October 1, 2000, to provide HHAs with access to the episode information in CWF. This new inquiry will facilitate claims submission given the consolidated billing requirements of HHPPS. HIQH will be accessible via each intermediary's claims interface, modeled on the current HIQA inquiry transaction. Entering the transaction ID HIQH will open an entry screen containing most elements currently required for HIQA, including the beneficiary's Health Insurance Claim (HIC) number, name, and sex plus intermediary and provider numbers and a CWF host. The one new addition to the entry data will be a date when you expect to serve the beneficiary.

When a HHA submits this inquiry, CWF will immediately return information on the two episode periods closest to the date submitted. If no episodes exist in CWF for a beneficiary, a message will be returned to indicate this. If no date is specified, the two most recent episode periods will be returned. For each of these episodes, the following information will be shown:

First, the basic entitlement information from page one of the HIQA inquiry will be shown. This means that although HIQA will remain available to HHAs, a separate HIQA inquiry will not be necessary to establish a beneficiary's Medicare eligibility. Next, specific information about the episode period will be returned, including the start and end dates of the episode and the patient status shown on the most recent claim processed in that episode. The intermediary number where the claim was processed and the provider number of the agency serving the beneficiary will also appear. The patient status codes displayed will be the same codes used on the UB-92 claim form. If a primary HHA exists, the patient status code will show if they are discharging the beneficiary, if they are aware the beneficiary is transferring, or if they plan to keep the beneficiary in their care.

The HIQH transaction will show the two most recent home health benefit periods, which Medicare uses to pay claims from the Part A or Part B trust funds, and the two most recent hospice periods for the beneficiary, if any. If Medicare Secondary Payer information or Health Maintenance Organization (HMO) enrollment information exists for the beneficiary, this information will be returned as well. All information returned from CWF will reflect data available as of the previous days claim submissions.

6. Cost Report Impacts of the HH PPS Transition

Cost reports will still be required after the implementation of HHPPS. Separate cost reports will not have to be filed for services before October 1, 2000, and services on or after October 1, 2000. HHAs will file a cost report in accordance with their normal cost reporting year. The Medicare statistics contained in the cost report will be separated for the October 1, 2000, implementation date. Medicare statistics for services before October 1, 2000 will be cost reimbursed, subject to the per-visit and per-beneficiary limitations. Medicare statistics for services on or after October 1, 2000, will be separately accumulated on the cost report and will differentiate prospectively paid services from other items excepted from PPS payment.

Materials reflecting specific instructional revisions of HHPPS payment will appear in the statistical section and other sections, as applicable, of the cost reporting instructions in the future. Such additions must be cleared by the Office of Management and Budget before being added to the cost reports.

A series of new reports are being developed to reflect HHPPS episode payments and payment adjustments in the provider statistical and reimbursement (PS&R) system.

The *effective date* for this PM is October 1, 2000.

The *implementation date* for this PM is October 1, 2000.

These instructions should be implemented within your current operating budget.

This PM may be discarded after October 1, 2001.

If you have any questions, contact your regional office.