

Beginning January 1, 2021, home health agencies will be required to submit RAPs within five calendar days, or they will incur financial penalties.

The countdown is on and much confusion remains around the upcoming change. To help you prepare, Corridor put together a list of FAQs outlining the important aspects Home Health Agencies need to understand moving into the new year.

1. What is required to submit a RAP starting January 1, 2021?

- One PDGM appropriate diagnosis
- Any HIPPS code
- A physician's verbal or written order to Home Health
- A completed initial visit admitting to Home Health care

2. Does the Diagnosis on RAP have to match the final claim?

No. The final claim diagnosis does not have to match the RAP.

3. Can I submit both period RAPS simultaneously?

Yes, if you have met the requirements to submit the RAP, both periods may be submitted at the SOC or Recert. Verify with your EMR if the system has any additional requirements to generate the second period RAP. For example, your EMR may require you to have visits plotted on the patient's calendar beyond 30 days to generate the second period simultaneously at SOC/REC.

- RAPs will not "auto-cancel." Therefore, if a patient is discharged prior to a 30-day period for which you anticipated care and submitted a RAP, a RAP Cancel will need to be completed.

4. Does the HIPPS code on my RAP required to match my final claim?

Yes. However, you can utilize any HIPPS. Please verify with your EMR how they will approach providing matching HIPPS for RAP and Final.

5. How will my final claim be paid if the HIPPS is a default?

The MAC continues to generate payment based upon the calculated amount generated from completed OASIS and the diagnosis codes reported on the claim, not the HIPPS submitted on the final claim.

6. What is the penalty for not submitting the RAP timely?

Payment reduction on 1/30th for each day from the SOC/admission or the "from date" on subsequent episode until the RAP is submitted.

**Note that because you get 5 days to submit the RAP, if you submit on day 6 you get a heftier penalty because it counts the first 5 days plus the 6th day = $6/30 = 1/5$ or 20% of 30-day payment*

Additionally, pay close attention to LUPAs. The untimely submission on a LUPA episode may be a larger impact to the agency. Under PDGM LUPAs are more challenging to predict along with penalty for not submitting RAP present an area of risk. However, if your final claim is processed as a No-RAP LUPA no penalty applies for not submitting RAP.

7. What is the effective date for No Pay RAPs?

The "from" date on your claim of January 1, 2021 and beyond. This includes recertified episodes with a M0090 date occurring within the 5-day recert period AND episode from date of January 1, 2021 or later.

8. How is the 5-day period counted?

Counted as "calendar days" which includes Sunday. The admission/SOC or subsequent "from" date on your claim is day 0.

**Note that your submission must be accepted by the MAC to meet timeliness requirement.*

For example, admission on January 1, 2021 the following Monday, January 4 you will be on calendar day 3 of your 5-day window to submit.