

Earlier this month Corridor put together “No-Pay RAP's in 2021: 8 Key Questions Answered,” a list of FAQs outlining the important aspects Home Health Agencies need to understand. Below is another set of FAQ's to help you dig a bit further as we quickly approach the new year.

1. If any PDGM acceptable diagnosis meets the requirement on RAP why does it matter which I choose?

Some things to consider:

- Following coding guidelines to report a diagnosis that is known for the patient is best practice.
- CMS collects data for other uses beyond payment impacts. Required fields by CMS have been later utilized to inform decisions around behavioral rules, payment adjustments and policy.
- Assess the impact of using any acceptable PDGM diagnosis on the clinician in POC development.
- Assess how using any acceptable PDGM diagnosis might impact the agencies use of tools that identify the clinical groupings, support utilization management and other care planning metrics.

2. What do I need for the physician's order?

Requirements of admission to home health services remain in effect. Documentation received during the referral process to initiate Home Health services and/or the verbal order process utilized to obtain the physicians order unless otherwise specified by state practice act.

3. When can I submit subsequent episode RAPS?

Subsequent episode RAP may be submitted the first day of the “from date” and may also submit both period RAPS.

4. Do you have any tips to avoid delay in submission?

Our insights:

- Utilize default HIPPS example 1AA11 and a PDGM appropriate diagnosis from referral document.
- Maintain close oversight of SOC/REC visit completion and synch back to office. Know where you stand today. Implement a tracking process and plan to manage the clinical staff to a standard of returning assessments the next morning. This includes weekends and holidays.
- Review completion times for SOC/REC and determine appropriate productivity expectations.
- Review scheduling protocols for SOC/REC for clinicians leaving on vacation, leaving the company etc. for impact to complete SOC/REC documentation.
- Streamline documentation where possible. Be careful not to eliminate key areas to support skilled care, compliance areas or HH requirements.
- Understand EMR requirements to generate RAPS, workflow changes, payor set up and complete testing as soon as available.
- Contact your Medicare Advantage plans NOW. Ask whether they will they follow CMS requirements for the submission of RAPs. Have frequent check-ins to identify changes in their policies. Many payors did not communicate their PDGM plans for 2020, which caused agencies delays and denials in payment.