



Elizabeth A. Kastner

Partner
Columbus
614.227.8852
ekastner@bricker.com

Hospice compliance: OIG Work Plan, quality reporting

January 19, 2018

OIG Work Plan

Hospices may wish to align their 2018 compliance initiatives with the Office of Inspector General (OIG) Work Plan. The OIG Work Plan sets forth various projects including audits and evaluations that are underway or planned to be addressed during the fiscal year. The Work Plan aims to identify HHS programs and operations most in need of attention and, accordingly, to set priorities for resource allocation. Two 2018 OIG hospice focused initiatives are:

Duplicative and overlapping claims. The OIG plans to review the appropriateness of Part D drug claims for individuals who are receiving hospice benefits under Part A to see whether Medicare paid twice for prescription drugs for hospice beneficiaries. The OIG will also review Medicare Part A payments to hospices to determine whether claims billed to Medicare Part B by providers furnishing services to a hospice patient were allowed.

Survey and complaint investigation. Another Work Plan item identified by the OIG is limited enforcement actions against poorly performing hospices. It remains to be seen what impact, if any, this OIG initiative will have on how

hospice surveys are conducted, but it nevertheless highlights the need for vigilance during the survey process now more than ever.

Hospice quality reporting system

The launch of the "[Hospice Compare](#)" website in August 2017 and the upcoming display of CAHPS® survey data on the website emphasize the need for hospices to make timely and accurate quality reporting a compliance priority in 2018. In addition, hospices that fail to comply with the quality data submission requirements face a two-percentage-point reduction to the market basket percentage increase for that fiscal year.

- The OIG Work Plan can be assessed [here](#).
- Information on the hospice quality reporting system can be found [here](#).