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Medicare Resources for Researching Inpatient Discharges within 14 Days of a Home Health Admission

Provider Types Affected

Home Health Agencies

Provider Action Needed

This Special Edition (SE) is for Home Health Agencies (HHAs) and it presents an overview of Medicare information resources available for researching inpatient discharges within 14 days of a home health admission, including how to accurately count the 14-day period, how to use Medicare inquiry screens to research inpatient discharges, and claims adjustments.

Background

Under the home health prospective payment system (HH PPS), if a beneficiary was discharged from a skilled nursing facility (SNF) or inpatient rehabilitation facility (rehab) during the 14 days before the start of a HH episode but was not also discharged from an acute care hospital during that period, the episode will receive a higher payment. If both SNF/rehab and inpatient stays occurred in the 14-day period or if neither stay occurred, the payment does not increase. Information about inpatient discharges prior to a HH episode is captured on the Outcomes and Assessment Information Set (OASIS) in item M0175. This item and other assessment data determine the HH PPS payment group for the episode, which is represented on a claim to Medicare as a Health Insurance Prospective Payment System (HIPPS) code.

A recent study by the Office of Inspector General (OIG) found that Medicare is paying many claims with Health Insurance Prospective Payment System (HIPPS) codes that report only the SNF or rehab stay in cases where Medicare's claims history shows an acute care hospitalization also occurred. During their research, the OIG asked HHAs about reasons for these coding errors. HHAs reported that they had difficulty in determining an accurate count of the 14-day period.

They also reported difficulty in acquiring information about a hospitalization that occurred prior to a SNF or rehab discharge since the hospital was not their direct admission source. The information below is provided to assist with both of these issues, so that OASIS item M0175 can be coded as accurately as possible.

Counting 14 Days Prior to Home Health Admission

The most common question regarding how to accurately count the 14-day period is where to begin counting. Which day is Day 1?

The OASIS Implementation Manual, in the Item-by-Item Tips for item M0175, says the "past 14 days encompasses the two-week period immediately proceeding the start of care/resumption of care."

This means that for purposes of counting the 14-day period the date of admission is Day 0 and the day immediately prior to the date of admission is Day 1. For example:

Admission Date	Day Before Admission (Day 1)	Day 14
August 20	August 19	August 6

In this example, any inpatient discharges falling on or after August 6 and prior to the HH admission date would be reported in item M0175.

Another easy way to determine this is to refer to a calendar. Using the same example, if the start of care or resumption of care date is Wednesday, August 20 look at a calendar to refer to the same day of the week two weeks ago, which in this case is August 6.

Please note that a reference for counting the 14 day period is included at the end of this article (Table 1), and it shows the correct Day 14 for every day in a calendar year.

Using Medicare Inquiry Screens to Research Inpatient Discharges

All HHAs have access to inquiry screens containing data in Medicare's Common Working File (CWF) system via their Regional Home Health Intermediary (RHHI). CWF contains eligibility and utilization information about individual Medicare beneficiaries.
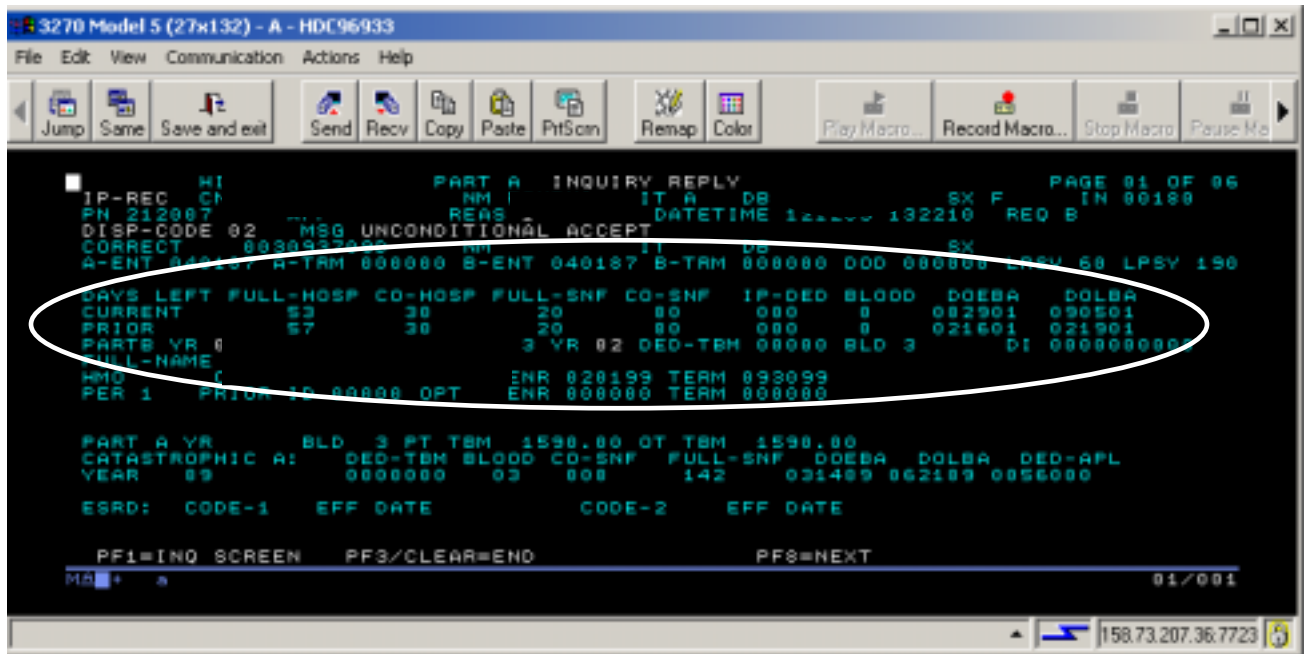
Inquiries into CWF are often known by a four-letter transaction identifier. For example, a transaction inquiring into a Medicare beneficiary's home health episode history has the four-letter **transaction identifier ELGH** (formerly HIQH).

Also, the four-letter **transaction identifier ELGA** (formerly HIQA) is associated with the transaction inquiring to see if a patient is a Medicare beneficiary (i.e., whether they have Medicare Part A and/or Part B eligibility). HHAs should also be aware that this same inquiry contains information about the beneficiary's inpatient spells of illness.   This information can be useful in determining how to answer OASIS item M0175.   Inpatient spells of illness are periods in which a Medicare beneficiary receives inpatient care prior to break of 60 days or more in which they do not receive any inpatient services.   Medicare benefits allow certain numbers of days of covered care in each spell of illness.

The response to an ELGA inquiry returns the following screen:

The circled data shown above reports the current and prior inpatient spells of illness. The first four numeric fields show the number of inpatient utilization days left to the beneficiary in various categories. Two of these 'days remaining' fields are significant when researching inpatient discharges:

- FULL-HOSP: This field shows the number of fully covered hospital days that remain available to the beneficiary. Medicare benefits include 60 fully covered hospital days. If the number in this field is less than 60, the beneficiary has been hospitalized during the spell of illness. The days used may be acute care or rehabilitation facility days.

- FULL-SNF: This field shows the number of fully covered skilled nursing facility days that remain available to the beneficiary. Medicare benefits include 20 fully covered skilled nursing facility days. If the number in this field is less than 20, the beneficiary has been an inpatient in a SNF during the spell of illness.

The next two fields contain information about the beneficiary's inpatient deductibles and are not significant to HHAs. The last fields contain six digit dates. The Date of Earliest Billing Action (DOEBA) represents the admission date of the hospital claim that started the spell of illness. The Date of Latest Billing Action (DOLBA) represents the statement "Through" date of the latest dated inpatient claim in the benefit period. If the beneficiary has been discharged to home health, and the preceding inpatient claims have been processed, this date will represent the date of discharge from the inpatient facility. Therefore, this date is particularly important when researching inpatient discharges relating to OASIS item M0175.

Example Scenarios

For the following scenarios, assume that a patient has been admitted to home care on March 1, 2004. **Each scenario represents the results of an ELGA inquiry into CWF performed upon admission**. In

all these scenarios, it is possible that inpatient services may have been provided but were not yet billed to Medicare, so the beneficiary and their caregiver(s) should still be asked about any recent inpatient stays.

1) No inpatient services in the current benefit period.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	60	30	20	80	000000	000000

What this response means:

The presence of 60 full hospital days (no days used) and the absence of any dates in the billing activity fields indicate that the beneficiary, if hospitalized, would be entering a new spell of illness. For this to be true, Medicare must have no record of an inpatient claim for 60 days.

Likely OASIS item MO175 response: NA – Patient was not discharged from an inpatient facility.

2) Only hospital inpatient services in the current benefit period. Discharge not within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	20	80	011504	012704

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60). Medicare has no record of a SNF stay (full SNF stays are still 20 - the maximum number). The discharge date (DOLBA) is over a full month prior to the HH admission.

Likely OASIS item MO175 response: NA – Patient was not discharged from an inpatient facility.

3) Only hospital inpatient services in the current benefit period. Discharge within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	20	80	020904	022004

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60). Medicare has no record of a SNF stay (full SNF stays are still 20 - the maximum number). The discharge date (DOLBA) is within the 14-day period, which for a March 1, 2004 admission extends to February 15.

Likely OASIS item MO175 response: A definitive response cannot be determined from this information alone. The hospital days used may be acute care or rehabilitation facility days. If they were previously

unaware of any inpatient stay, the HHA should ask the beneficiary or their caregiver(s) about the facility in which the beneficiary was served. Depending on this information the M0175 response may be "1 – Hospital" or "2 – Rehabilitation Facility."   If this information cannot be determined from the beneficiary, the HHA may contact the RHHI about the type of claim that was processed by Medicare.

If the HHA is aware that the discharge source to home care was a SNF, but the SNF billing is not yet reflected on Medicare systems, they may also answer "3 – Skilled Nursing Facility." It is important to note that in this case the inquiry may reveal to the HHA a hospitalization they were unaware of and prevent the miscoding of the HH claim based on the presence of a SNF discharge only.

4) Both hospital inpatient services and SNF services in the current benefit period. Discharge not within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	12	80	011504	020404

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60).   The beneficiary was also an inpatient at a SNF (full SNF days are less than 20). The discharge date (DOLBA) does not fall within the period 14 days prior to the HH admission.

Likely OASIS item MO175 response: "NA – Patient was not discharged from an inpatient facility."

5) Both hospital inpatient services and SNF services in the current benefit period. SNF days fewer than 14. Both discharges may be within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	12	80	020904	022804

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60). The beneficiary was also an inpatient at a SNF (full SNF days are less than 20). The discharge date (DOLBA) is within the 14-day period, which for a March 1, 2004 admission extends to February 16.

Likely OASIS item MO175 response: A response of "3 – Skilled Nursing Facility" can be determined from this information if the HHA was previously unaware of any inpatient stay. Since only 8 SNF days are used in the period, it is possible the beneficiary was also discharged from a hospital stay within the 14-day period. That is, the beneficiary may have been admitted to the SNF almost immediately from the hospital.

The hospital days used may be acute care or rehabilitation facility days.   Again this information and the discharge date may be asked of the beneficiary or their caregiver(s). If it cannot be determined from the

beneficiary, the HHA may contact the RHHI. Depending on this information the M0175 response may also be "1 – Hospital" or "2 – Rehabilitation Facility."

In this case also the inquiry may reveal to the HHA a hospitalization they were unaware of and prevent the miscoding of the HH claim based on the presence of a SNF discharge only.

6) Both hospital inpatient services and SNF services in the current benefit period. SNF days fewer than 14. Only SNF discharge may be within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	12	80	013004	021804

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60).   The beneficiary was also an inpatient at a SNF (full SNF days are less than 20). The discharge date (DOLBA) is 2 days within the 14-day period, but there are 8 SNF days used.

Likely OASIS item MO175 response: A response of "3 – Skilled Nursing Facility" only can be determined from this information. Since 8 SNF days are used in the period, but only 2 days remained in the 14-day period for another discharge to occur, it is extremely unlikely the beneficiary was also discharged from a hospital stay within the 14-day period.

It is important to note that in this case also the inquiry may reveal to the HHA a SNF stay they were unaware of and prevent the miscoding of the HH claim. In this case the HHA may code their claim with a higher-paying HIPPS code based on the SNF discharge only.

7) Both hospital inpatient services and SNF services in the current benefit period. SNF days greater than 14. Only SNF discharge may be within 14 days.

Inquiry response:

DAYS LEFT	FULL-HOSP	CO-HOSP	FULL-SNF	CO-SNF	DOEBA	DOLBA
CURRENT	48	30	0	76	012404	022804

What this response means:

The beneficiary was hospitalized recently (full hospital days are less than 60).   The beneficiary was also an inpatient at a SNF, likely for an extended period (full SNF stays exhausted and SNF co-insurance days are used). The discharge date (DOLBA) is within the 14-day period.

Likely OASIS item MO175 response: A response of "3 – Skilled Nursing Facility" is the most likely outcome from this information. Since 24 SNF days are used in the period, those days would exhaust the balance of the 14 day period making it very unlikely the beneficiary was also discharged from a hospital stay within the 14 day period. It is possible that there was an intervening hospitalization within the 24-day SNF stay that

cannot be recognized from this inquiry response. The HHA should ask the beneficiary or their caregiver(s) about this possibility. This same possibility exists in scenario 6 also, but is much more remote.

Again in this case also the inquiry may reveal to the HHA a SNF stay they were unaware of and prevent the miscoding of the HH claim. In this case the most likely result is that the HHA may code their claim with a higher-paying HIPPS code based on the SNF discharge only.

Claims Adjustments

As the scenarios described above demonstrate, the data provided by Medicare inquiry screens will not provide complete answers to HHAs' questions in all cases prior to billing for an episode. In these cases, it can be used to target further inquiries to beneficiaries, their caregivers or to the RHHI that will yield the information. HHAs should seek to bill as accurately as possible with the information available. Doing so may reduce or avoid subsequent adjustments initiated by Medicare to recover excess payments associated with inaccurate HIPPS codes.

Over time, as hospitals and SNFs complete their billing for all Medicare discharges, the information available via ELGA inquiries becomes more and more complete. If HHAs have concerns that they have not properly recognized all hospital and SNF discharges, this information is available for use in quality assurance reviews of Medicare billing. If an HHA discovers a SNF or rehabilitation stay that they have not reflected accurately on their claim and were underpaid for an episode as a result, the HHA may submit an adjustment to correct their HIPPS code and receive additional payment. HHAs have the full Medicare timely filing period (15-27 months) to do such reviews of their billing using this information and to make any necessary adjustments to their claims.

Additional Information

The Centers for Medicare and Medicaid Services (CMS) Web site for the Outcome and Assessment Information Set (OASIS) can be found at:

http://www.cms.hhs.gov/oasis/

The purpose of this Web site is to store and disseminate policy and technical information related to OASIS for use in HHAs, and it is intended to assist HHAs, State agencies, software vendors, professional associations and other Federal agencies in implementing and maintaining OASIS.

Should you have questions, please contact your RHHI at their toll-free number. If you do not have that number, you may find it at http://www.cms.hhs.gov/medlearn/tollnums.asp.

Table 1. Look-up Table for Determining 14 Days from Episode Start Date for OASIS Item M0175

HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175
1-Jan	18-Dec	18-Feb	4-Feb	7-Apr	24-Mar
2-Jan	19-Dec	19-Feb	5-Feb	8-Apr	25-Mar
3-Jan	20-Dec	20-Feb	6-Feb	9-Apr	26-Mar
4-Jan	21-Dec	21-Feb	7-Feb	10-Apr	27-Mar
5-Jan	22-Dec	22-Feb	8-Feb	11-Apr	28-Mar
6-Jan	23-Dec	23-Feb	9-Feb	12-Apr	29-Mar
7-Jan	24-Dec	24-Feb	10-Feb	13-Apr	30-Mar
8-Jan	25-Dec	25-Feb	11-Feb	14-Apr	31-Mar
9-Jan	26-Dec	26-Feb	12-Feb	15-Apr	1-Apr
10-Jan	27-Dec	27-Feb	13-Feb	16-Apr	2-Apr
11-Jan	28-Dec	28-Feb	14-Feb	17-Apr	3-Apr
12-Jan	29-Dec	1-Mar	15-Feb	18-Apr	4-Apr
13-Jan	30-Dec	2-Mar	16-Feb	19-Apr	5-Apr
14-Jan	31-Dec	3-Mar	17-Feb	20-Apr	6-Apr
15-Jan	1-Jan	4-Mar	18-Feb	21-Apr	7-Apr
16-Jan	2-Jan	5-Mar	19-Feb	22-Apr	8-Apr
17-Jan	3-Jan	6-Mar	20-Feb	23-Apr	9-Apr
18-Jan	4-Jan	7-Mar	21-Feb	24-Apr	10-Apr
19-Jan	5-Jan	8-Mar	22-Feb	25-Apr	11-Apr
20-Jan	6-Jan	9-Mar	23-Feb	26-Apr	12-Apr
21-Jan	7-Jan	10-Mar	24-Feb	27-Apr	13-Apr
22-Jan	8-Jan	11-Mar	25-Feb	28-Apr	14-Apr
23-Jan	9-Jan	12-Mar	26-Feb	29-Apr	15-Apr
24-Jan	10-Jan	13-Mar	27-Feb	30-Apr	16-Apr
25-Jan	11-Jan	14-Mar	28-Feb	1-May	17-Apr
26-Jan	12-Jan	15-Mar	1-Mar	2-May	18-Apr
27-Jan	13-Jan	16-Mar	2-Mar	3-May	19-Apr
28-Jan	14-Jan	17-Mar	3-Mar	4-May	20-Apr
29-Jan	15-Jan	18-Mar	4-Mar	5-May	21-Apr
30-Jan	16-Jan	19-Mar	5-Mar	6-May	22-Apr

HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175
31-Jan	17-Jan	20-Mar	6-Mar	7-May	23-Apr
1-Feb	18-Jan	21-Mar	7-Mar	8-May	24-Apr
2-Feb	19-Jan	22-Mar	8-Mar	9-May	25-Apr
3-Feb	20-Jan	23-Mar	9-Mar	10-May	26-Apr
4-Feb	21-Jan	24-Mar	10-Mar	11-May	27-Apr
5-Feb	22-Jan	25-Mar	11-Mar	12-May	28-Apr
6-Feb	23-Jan	26-Mar	12-Mar	13-May	29-Apr
7-Feb	24-Jan	27-Mar	13-Mar	14-May	30-Apr
8-Feb	25-Jan	28-Mar	14-Mar	15-May	1-May
9-Feb	26-Jan	29-Mar	15-Mar	16-May	2-May
10-Feb	27-Jan	30-Mar	16-Mar	17-May	3-May
11-Feb	28-Jan	31-Mar	17-Mar	18-May	4-May
12-Feb	29-Jan	1-Apr	18-Mar	19-May	5-May
13-Feb	30-Jan	2-Apr	19-Mar	20-May	6-May
14-Feb	31-Jan	3-Apr	20-Mar	21-May	7-May
15-Feb	1-Feb	4-Apr	21-Mar	22-May	8-May
16-Feb	2-Feb	5-Apr	22-Mar	23-May	9-May
17-Feb	3-Feb	6-Apr	23-Mar	24-May	10-May

HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175
25-May	11-May	12-Jul	28-Jun	29-Aug	15-Aug
26-May	12-May	13-Jul	29-Jun	30-Aug	16-Aug
27-May	13-May	14-Jul	30-Jun	31-Aug	17-Aug
28-May	14-May	15-Jul	1-Jul	1-Sep	18-Aug
29-May	15-May	16-Jul	2-Jul	2-Sep	19-Aug
30-May	16-May	17-Jul	3-Jul	3-Sep	20-Aug
31-May	17-May	18-Jul	4-Jul	4-Sep	21-Aug
1-Jun	18-May	19-Jul	5-Jul	5-Sep	22-Aug
2-Jun	19-May	20-Jul	6-Jul	6-Sep	23-Aug
3-Jun	20-May	21-Jul	7-Jul	7-Sep	24-Aug
4-Jun	21-May	22-Jul	8-Jul	8-Sep	25-Aug
5-Jun	22-May	23-Jul	9-Jul	9-Sep	26-Aug

6-Jun	23-May	24-Jul	10-Jul	10-Sep	27-Aug
7-Jun	24-May	25-Jul	11-Jul	11-Sep	28-Aug
8-Jun	25-May	26-Jul	12-Jul	12-Sep	29-Aug
9-Jun	26-May	27-Jul	13-Jul	13-Sep	30-Aug
10-Jun	27-May	28-Jul	14-Jul	14-Sep	31-Aug
11-Jun	28-May	29-Jul	15-Jul	15-Sep	1-Sep
12-Jun	29-May	30-Jul	16-Jul	16-Sep	2-Sep
13-Jun	30-May	31-Jul	17-Jul	17-Sep	3-Sep
14-Jun	31-May	1-Aug	18-Jul	18-Sep	4-Sep
15-Jun	1-Jun	2-Aug	19-Jul	19-Sep	5-Sep
16-Jun	2-Jun	3-Aug	20-Jul	20-Sep	6-Sep
17-Jun	3-Jun	4-Aug	21-Jul	21-Sep	7-Sep
18-Jun	4-Jun	5-Aug	22-Jul	22-Sep	8-Sep
19-Jun	5-Jun	6-Aug	23-Jul	23-Sep	9-Sep
20-Jun	6-Jun	7-Aug	24-Jul	24-Sep	10-Sep
21-Jun	7-Jun	8-Aug	25-Jul	25-Sep	11-Sep
22-Jun	8-Jun	9-Aug	26-Jul	26-Sep	12-Sep
23-Jun	9-Jun	10-Aug	27-Jul	27-Sep	13-Sep
24-Jun	10-Jun	11-Aug	28-Jul	28-Sep	14-Sep
25-Jun	11-Jun	12-Aug	29-Jul	29-Sep	15-Sep
26-Jun	12-Jun	13-Aug	30-Jul	30-Sep	16-Sep
27-Jun	13-Jun	14-Aug	31-Jul	1-Oct	17-Sep
28-Jun	14-Jun	15-Aug	1-Aug	2-Oct	18-Sep
29-Jun	15-Jun	16-Aug	2-Aug	3-Oct	19-Sep
30-Jun	16-Jun	17-Aug	3-Aug	4-Oct	20-Sep
1-Jul	17-Jun	18-Aug	4-Aug	5-Oct	21-Sep
2-Jul	18-Jun	19-Aug	5-Aug	6-Oct	22-Sep
3-Jul	19-Jun	20-Aug	6-Aug	7-Oct	23-Sep
4-Jul	20-Jun	21-Aug	7-Aug	8-Oct	24-Sep
5-Jul	21-Jun	22-Aug	8-Aug	9-Oct	25-Sep
6-Jul	22-Jun	23-Aug	9-Aug	10-Oct	26-Sep
7-Jul	23-Jun	24-Aug	10-Aug	11-Oct	27-Sep
8-Jul	24-Jun	25-Aug	11-Aug	12-Oct	28-Sep

9-Jul	25-Jun	26-Aug	12-Aug	13-Oct	29-Sep
10-Jul	26-Jun	27-Aug	13-Aug	14-Oct	30-Sep
11-Jul	27-Jun	28-Aug	14-Aug	15-Oct	1-Oct

HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175	HH Episode Start Date	Day 14 for Item M0175
16-Oct	2-Oct	11-Nov	28-Oct	7-Dec	23-Nov
17-Oct	3-Oct	12-Nov	29-Oct	8-Dec	24-Nov
18-Oct	4-Oct	13-Nov	30-Oct	9-Dec	25-Nov
19-Oct	5-Oct	14-Nov	31-Oct	10-Dec	26-Nov
20-Oct	6-Oct	15-Nov	1-Nov	11-Dec	27-Nov
21-Oct	7-Oct	16-Nov	2-Nov	12-Dec	28-Nov
22-Oct	8-Oct	17-Nov	3-Nov	13-Dec	29-Nov
23-Oct	9-Oct	18-Nov	4-Nov	14-Dec	30-Nov
24-Oct	10-Oct	19-Nov	5-Nov	15-Dec	1-Dec
25-Oct	11-Oct	20-Nov	6-Nov	16-Dec	2-Dec
26-Oct	12-Oct	21-Nov	7-Nov	17-Dec	3-Dec
27-Oct	13-Oct	22-Nov	8-Nov	18-Dec	4-Dec
28-Oct	14-Oct	23-Nov	9-Nov	19-Dec	5-Dec
29-Oct	15-Oct	24-Nov	10-Nov	20-Dec	6-Dec
30-Oct	16-Oct	25-Nov	11-Nov	21-Dec	7-Dec
31-Oct	17-Oct	26-Nov	12-Nov	22-Dec	8-Dec
1-Nov	18-Oct	27-Nov	13-Nov	23-Dec	9-Dec
2-Nov	19-Oct	28-Nov	14-Nov	24-Dec	10-Dec
3-Nov	20-Oct	29-Nov	15-Nov	25-Dec	11-Dec
4-Nov	21-Oct	30-Nov	16-Nov	26-Dec	12-Dec
5-Nov	22-Oct	1-Dec	17-Nov	27-Dec	13-Dec
6-Nov	23-Oct	2-Dec	18-Nov	28-Dec	14-Dec
7-Nov	24-Oct	3-Dec	19-Nov	29-Dec	15-Dec
8-Nov	25-Oct	4-Dec	20-Nov	30-Dec	16-Dec
9-Nov	26-Oct	5-Dec	21-Nov	31-Dec	17-Dec
10-Nov	27-Oct	6-Dec	22-Nov		