

Report on Medicare Compliance Volume 29, Number 27. July 27, 2020 Home Health Audit Demonstration Is Back; HHAs Have Three Choices

By Nina Youngstrom

CMS is resuming its home health pre-claim review demonstration, which is designed to identify and prevent overpayments, on Aug. 3. The five-year Review Choice Demonstration for Home Health Services,^[1] as it's formally known, gives home health agencies (HHAs) in five states three options for medical reviews.

That turns up the heat on already-reeling HHAs, said Regina Alexander, senior consultant at VantagePoint HealthCare Advisors in Hamden, Connecticut. Three of the states, Florida, Texas and North Carolina, currently are in the eye of the COVID-19 storm. The other two are Ohio and Illinois. At the same time, while HHAs got relief from Sec. 1135 waivers that are in effect during the public health emergency, they're not the kind that "help with cash flow," Alexander said. For example, one waiver allows patients to meet the homebound criteria for Medicare coverage of home health because they have COVID-19.

Also, while the 2021 proposed home health prospective payment system regulation,^[2] which was published in the June 30 *Federal Register*, would permanently expand the use of telehealth, HHAs could be providing more services without nudging the low utilization payment adjustment, she said. That could mean more services, same reimbursement.

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