

## Compliance Today - June 2022 Hospice audits

By Catherine Boerner

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There is much activity around hospice audits and extrapolating samples. It is important to review these audit reports and understand the focus of where some of these findings have been reconsidered and changed.



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You can find the letters from some law firms within these reports stating, for example:

In sum, the OIG's [Office of Inspector General] IMRC [Independent Medical Review Contractor] reviewers, and by extension the OIG, applied the wrong legal documentation standard as to what the Medicare hospice benefit requires to support a terminal prognosis and support a claim for hospice services that were indeed furnished. OIG's Draft Report does not contend services were not furnished; nor does the Draft Report contend, because it cannot, that the hospice physicians failed to certify in good faith that each patient had a terminal prognosis for each hospice benefit period under review. [1]

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