

Centers for Medicare & Medicaid Services
Special Open Door Forum:
Final Rule CMS-1599-F: Discussion of the Hospital Inpatient Admission Order and
Certification; 2 Midnight Benchmark for Inpatient Hospital Admissions.
Tuesday, February 4, 2014;
1:00-2:00 PM Eastern Time
Conference Call Only

CMS will host a follow-up Special Open Door Forum (ODF) call to allow hospitals, practitioners, and other interested parties to ask questions on the physician order and physician certification, inpatient hospital admission and medical review criteria that were released on August 2, 2013 in the FY 2014 Inpatient Prospective Payment System (IPPS)/Long-Term Care Hospital (LTCH) final rule (CMS-1599-F).

[CMS final rule 1599-F](#) clarifies that for purposes of payment under Medicare Part A, a Medicare beneficiary is considered an inpatient of a hospital, including a critical access hospital, if formally admitted as an inpatient pursuant to an order for inpatient admission by a physician or other qualified practitioner. The final rule provides instruction on when an inpatient hospital admission should be ordered and certified, and clarifies that as a condition of Part A payment, the order must also be documented in the medical record in accordance with the regulations, and a physician must certify the medical necessity of hospital inpatient services. The new rules are intended to address concerns about some Medicare beneficiaries having long stays in the hospital as outpatients and improve the integrity of inpatient admissions to acute care hospitals, critical access hospitals, long term care hospitals and inpatient psychiatric facilities through the introduction of the “2-Midnight Rule”. Under the rule, if the ordering practitioner expects a beneficiary’s surgical procedure, diagnostic test or other treatment to require a stay in the hospital lasting at least two midnights, and admits the beneficiary as an inpatient based on that expectation, it is generally appropriate that the hospital receive Medicare Part A payment. The final rule emphasizes the need for a formal order of inpatient admission to begin inpatient status, but permits the ordering practitioner to consider all time a patient has already spent in the hospital as an outpatient receiving observation services, or receiving care in the emergency department, operating room, or other treatment area in guiding their two-midnight expectation.

Additional information on the inpatient hospital admissions policy can be found at go.cms.gov/InpatientHospitalReview. Additional information relating to the order and certification provisions may be located on the Centers for Medicare & Medicaid Services (CMS) [Hospital Center webpage](#). Feedback and questions on the two midnight provision for admission and medical review can be sent to IPPSAdmissions@cms.hhs.gov. This topic was recently discussed, and training materials provided, during a [Medicare Learning Network National Provider Call](#) on January 14, 2014.

We look forward to your participation.

Special Open Door Participation Instructions:
Participant Dial-In Number(s): (877) 251-0301
Conference ID # 47736519

For ODF schedules, updates and E-Mailing List registration, visit our website at <http://www.cms.gov/OpenDoorForums/>.

Thank you.