

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, November 12, 2013

1:00pm – 2:00pm Eastern Time

Conference Call Only

CMS will host a third, 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 for the practitioner and facility when inpatient hospital admissions are generally appropriate for Medicare Part A payment. The new rules are intended to address concerns about some Medicare beneficiaries having long stays in the hospital as outpatients and improve program integrity. 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. Also 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 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.

You can find the final rule by going to: <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/FY2014-IPPS-Final-Rule-Home-Page.html>.

CMS also posted subregulatory instruction, relating to the claim selection process and preliminary review guidelines, for conducting patient status reviews of claims with Dates of Admission in October 2013 or later. These documents, as well as a document addressing some frequently asked questions, may be located at: <http://go.cms.gov/InpatientHospitalReview>. CMS will continue to use this website to post future updates.

Feedback and questions on the two midnight provision for admission and medical review can be sent to [IPPSAdmissions@cms.hhs.gov](mailto:IPPSAdmissions@cms.hhs.gov). Questions on Part B inpatient billing and the

clarifications regarding the physician order and certification should be sent to the subject matter staff listed in the final rule. CMS also recently released [New Guidance on the Physician Order and Physician Certification for Hospital Inpatient Admissions](#).

Special Open Door Participation Instructions:  
Participant Dial-In Number: 1-(866) 501-5502  
Conference ID #: 98515298

Please note: participants do not need to pre-register to join this conference. However, because of the expected high call volume, we kindly ask you call in a few minutes prior to the call start.

Note: TTY Communications Relay Services are available for the Hearing Impaired. For TTY services dial 7-1-1 or 1-800-855-2880. A Relay Communications Assistant will help. For automatic emails of Open Door Forum schedule updates (E-Mailing list subscriptions) and to view Frequently Asked Questions please visit our website at <http://www.cms.gov/opendoorforums/>.

Thank you for your interest in CMS Open Door Forums.