

**Provider Compliance Group Special Open Door Forum** 

May 3, 2018

2:00-3:00 pm Eastern Time

**Conference Call** 

Participant Dial-In Number: 1-(800)-837-1935

Conference ID: 1554959

**Kevin Young** 

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Center for Program Integrity

Centers fort Medicare and MedicaidServices

# Medical Review Documentation Compliance and Technology Contract

- CVP, Fairfax, VA 22030 <u>www.cvpcorp.com</u>
  - Tasked with providing services to facilitate health care providers' medical record documentation and Medicare contractors' review of medical record documentation.
  - Mechanism:
    - Templates and Clinical Data Elements to assist providers in improving documentation.
- Participating CVP technical support for this SODF:
  - Dr. Mark Pilley, Medical Director, StrategicHealthSolutions
  - Robert Dieterle, CEO EnableCare, LLC

### **Agenda**

- Introduction and Background Kevin Young
- Overview of Templates and Clinical Data Elements Robert Dieterle
- Q&A Kevin Young
   Robert Dieterle
   Dr. Mark Pilley

## Background on Improper Payment for DMEPOS Drug Related Items (FY 2017 CERT Report)

- External Infusion Pumps and related drugs
  - Improper payment rate: 23.1 % (148 million dollars)
  - 76.7 % due to incomplete documentation
- Nebulizers and related drugs
  - Improper payment rate: 13.4 % (106million dollars)
  - 88.5 % due to incomplete documentation
- Immunosuppressive Drugs
  - Improper payment rate: 34.3 % (93 million dollars)
  - 57.4 % due to incomplete documentation

The draft DMEPOS Drug Related Templates and the associated Clinical Data Elements (CDEs) are available on the CMS.gov website which can be accessed through the link below:

https://www.cms.gov/Research-Statistics-Data-and-Systems/Computer-Data-and-Systems/Electronic-Clinical-Templates/DMEPOS-Templates.html

#### **External Infusion Pumps**

Order -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

F2F Encounter -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

Lab Test Results -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

Appendices -- Appendices R0.1a 4/30/2018

#### **Nebulizers**

Order -- CDEs Draft R1.0a 4/302018 -- Template Draft R1.0a 4/30/2018

F2F Encounter -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

Appendices -- Appendix A R0.1a 4/30/2018

#### **Immunosuppressive Drugs**

Order -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

Order & Dispense -- Template Draft R1.0a 4/30/2018

Progress Note -- CDEs Draft R1.0a 4/30/2018 -- Template Draft R1.0a 4/30/2018

Also available with the Templates and CDEs:

The CMS presentation for the Special Open Door Forum -- "DMEPOS Drug Related Templates and Clinical Data Elements (CDEs)", held on May 3, 2018; 3:00-4:00 pm Eastern Time.

### What are Clinical Data Elements?

Definitions of the content of individual "fields" in a template

### **Each CDE has the following characteristics:**

- Unique identification (e.g. PDN01, PND02)
- Name (e.g. Patient Name, Date of Birth)
- Data type (e.g. text, date, number, value from a set)
- Selection type (e.g. single, multiple)
- Value Set (list of allowed selections) (e.g. Items to orders, diagnoses)

### DMEPOS Drug Related Example Clinical Data Elements (CDEs)

PBD: Patient/Beneficiary Demographics

**PBD1**: Patient's first name, last name and middle initial (text)

**PBD2**: Patient's date of birth (date: MM/DD/YYYY)

**PBD3**: Patient's Gender (Single selection from the value set: M/F/O)

PBD4: Patient's Medicare ID (Medicare ID format and check digit)

PND: Provider/NPP Demographics

**PND1**: Provider or Allowed NPP first name, last name, middle initial and suffix (text)

PND2: Provider NPI (Numeric with check digit)

**PND3**: Provider Telephone Number (xxx-xxx-xxxxx ext xxxx)

**PND4**: Provider Direct address (Direct address)

### **Use of Color and Font for Templates and CDEs**

- 1) CDEs in black Calibri are required
- 2) CDEs in burnt orange Italics Calibri are required if the condition is met
- 3) CDEs in blue Times New Roman are recommended but not required

### **General Template and CDE Information**

### **USE** of templates and CDEs

- Medicare does not require the use of these templates and CDEs for reimbursement for DMEPOS Drug Related Items.
- CDEs are designed for incorporation into provider EHR templates used to collect information during a patient encounter, recording laboratory results, and placing an order.
- Optional elements are present to assist providers in documenting the encounter and recording any pertinent information.
- Templates are visual representations of the CDE and may be printed, completed and made part of the patient's medical record in the event the provider does not have an EHR or the EHR does not support the elements to show that a DMEPOS drug related item is medically necessary and appropriate based on Medicare documentation requirements.

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
  - Required/*conditional* sections
    - Patient information
    - Diagnosis
    - Signature, name, date ordered and NPI (for WOPD)
    - Start date if different from date of order
    - Type of order
    - Drugs, associated devices and supplies (may be required or optional depending on item and benefit)
  - Optional sections
    - F2F or in- person provider information
    - Date of F2F or \in-person evaluation

### **DMEPOS Drug Related**

### Nebulizers and External Infusion Pump F2F Encounter Immunosuppressive Drugs Progress Note Template and Clinical Data Elements (CDEs)

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
  - Required/conditional sections
    - Patient information
    - Diagnoses
    - Treatment plan
    - Signature, name, date, and NPI
    - Benefit specific qualification information (elements may be conditional or optional)
  - Optional sections
    - Chief complaint and related past medical history
    - Medications
    - Allergies
    - Review of Systems (variation based on specific device)
    - Physical Examination (sections required for PAP and RAD)
    - Assessment
    - Orders

### DMEPOS Drug Related – External Infusion Pump Only Lab Test Results Template and Clinical Data Elements (CDEs)

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
  - Required/conditional sections
    - Patient information
    - Date of testing
    - Testing
      - Fasting plasma glucose
      - C-peptide
      - Beta cell autoantibody
      - A1c
      - Creatine clearance
  - Optional sections
    - Provider information for F2Fvisit
    - Person performing testing
    - Signature

**Questions?** 

General Comments/Recommendations?

Feedback and suggestions on the templates can be sent to: clinicaltemplates@cms.hhs.gov