

## **Home Health Pre-Claim Review (PCR) Demonstration Pause Questions and Answers**

**Q: Why is CMS pausing the PCR demonstration?**

A: CMS is pausing the PCR demonstration while we consider a number of changes to improve the PCR demonstration.

**Q: What kind of changes are CMS considering?**

A: CMS is considering a number of structural improvements in response to feedback received on the demonstration to date.

**Q: For how long will the PCR demonstration be paused?**

A: The pause will be for at least 30 days. Via an update to its website, CMS will notify providers at least 30 days in advance of further developments related to the demonstration.

**Q: What happens to the PCR requests I have already submitted to the MAC but for which I have not yet received a decision?**

A: Effective April 1, 2017, MACs will cease reviewing PCR requests and will process home health claims under normal claim processing rules, as in effect outside the PCR demonstration.

**Q: What happens if I have submitted a PCR request, it was reviewed and non-affirmed by the MAC, and I was preparing a resubmission package? Can I still submit it?**

A: Effective April 1, 2017, MACs will cease reviewing PCR requests, including resubmissions of PCR requests. MACs will process home health claims under normal claim processing rules, without regard to whether a PCR decision was made and/or a Unique Tracking Number (UTN) is included on the claim.

**Q: I received an affirmative decision on my PCR request and received a UTN. When I submit the claim, should I include the UTN on the claim?**

A: Providers that received UTNs (indicating that a PCR decision was rendered) are encouraged to include such UTNs on home health claims they submit, even those claims submitted after April 1, 2017. Claims submitted with a UTN will continue to be excluded from Recovery Audit Contractor (RAC) and Supplemental Medical Review Contractor postpayment reviews and most MAC prepayment and postpayment reviews.

**Providers are reminded that UTNs received via PCR submission must match the beneficiary, PTAN, NPI, episode dates of care and HCPCS codes on the PCR request that is associated with the final claim being billed. The same UTN cannot be submitted for multiple episodes of care or multiple beneficiaries. Claims submitted with UTNs for which there is no associated PCR request may be subject to additional medical review.**

Updated 4/28/17

**Q: During the pause, will claims in Illinois and Florida be automatically paid by the MAC?**

A: Effective April 1, 2017, MACs will process home health claims under normal claim processing rules, without regard to whether the claim underwent PCR. The system will treat claims as it did before August 3, 2016 when the PCR demonstration began.

**Q: Can I submit a PCR request if it is for a date of service before April 1, 2017?**

A: Effective April 1, 2017, MACs will not accept any PCR requests, regardless of the date of service listed on the PCR request. PCR requests should not be submitted during the pause and will not be reviewed by the MAC.

**Q: How will the delay impact the anticipated start of the PCR demonstration in other states?**

A: The start dates for Texas, Michigan, and Massachusetts have not been announced. CMS will provide at least 30 days' notice on its website prior to beginning in any state.

**Q: Will claims with dates of service before April 1, 2017 that don't contain a UTN be subject to prepayment review and payment reduction?**

A: No. Continuing throughout the pause, MACs will process these claims according to the normal claim processing rules, without regard to whether the claim includes a UTN. Claims without a UTN will not be automatically subject to prepayment review or a 25% payment reduction.

**Q: I have a case with a March date of service, but I haven't submitted a PCR request yet. Should I hold the claim until after the pause is over so I can submit a PCR at that time?**

A: Providers are not encouraged to hold claims. Claims submitted after April 1, 2017, will be processed according to the normal claim processing rules, without regard to whether the claim underwent PCR or includes a UTN.

**Q: Will the demonstration expand to Florida?**

A: CMS does not have a timetable for further developments related to the demonstration and is exploring options to improve the program. CMS will provide at least 30 days' notice on its website prior to expanding the demonstration to FL or any other state.

**Q: Will the MACs be conducting any reviews of home health claims during the pause?**

A: During the pause, the MACs will conduct pre-payment reviews of home health claims submitted by home health providers in Illinois and Florida for episodes that began on or after 10/1/2016. The MACs will be using a modified Probe and Educate strategy for these reviews. Claims that have pre-claim review decisions on file will not be selected for the reviews. The purpose of this Probe and Educate process is to further assess and promote provider understanding and compliance with the Medicare home health eligibility requirements.