

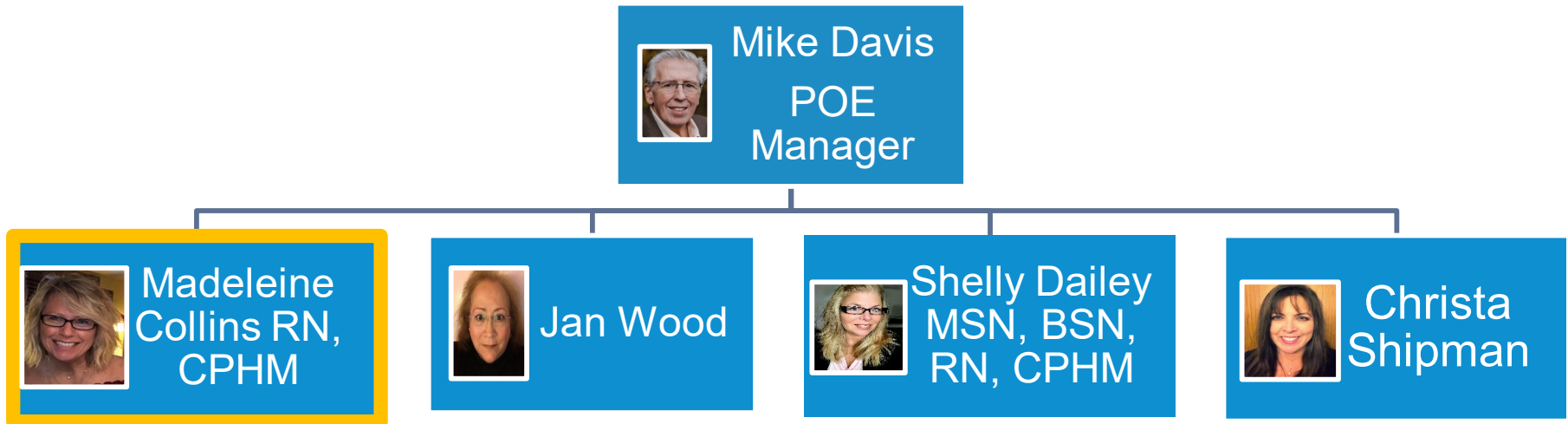
Understanding Physician and Nonphysician Practitioner Roles and Responsibilities in Hospice - 1/24/2022



Today's Presenters



National Government Services Provider Outreach and Education Home Health and Hospice Team



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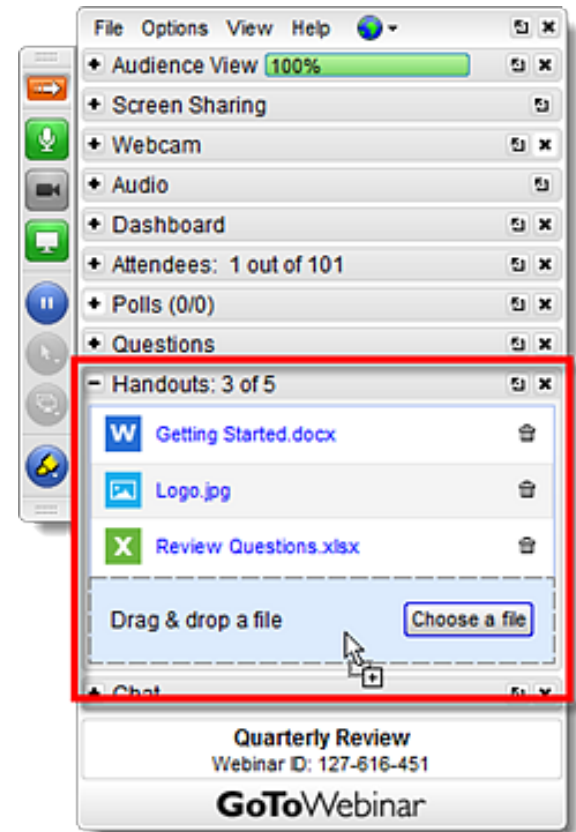
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Today's PowerPoint Presentation

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- Select the PowerPoint to download the presentation



Objectives

- To assist providers with a greater understanding of the federal Medicare hospice benefit regulations regarding physician and nonphysician practitioner roles and responsibilities in hospice care.

Agenda

- The Physician Role in Hospice
- Understanding the Role of the:
 - Medical Director/Team Physician
 - Attending Physician
 - Nurse Practitioner
 - Physician Assistant
 - Consulting Physician
 - Referring Physician
- Collaboration
- References and Resources

The Physician Role in Hospice



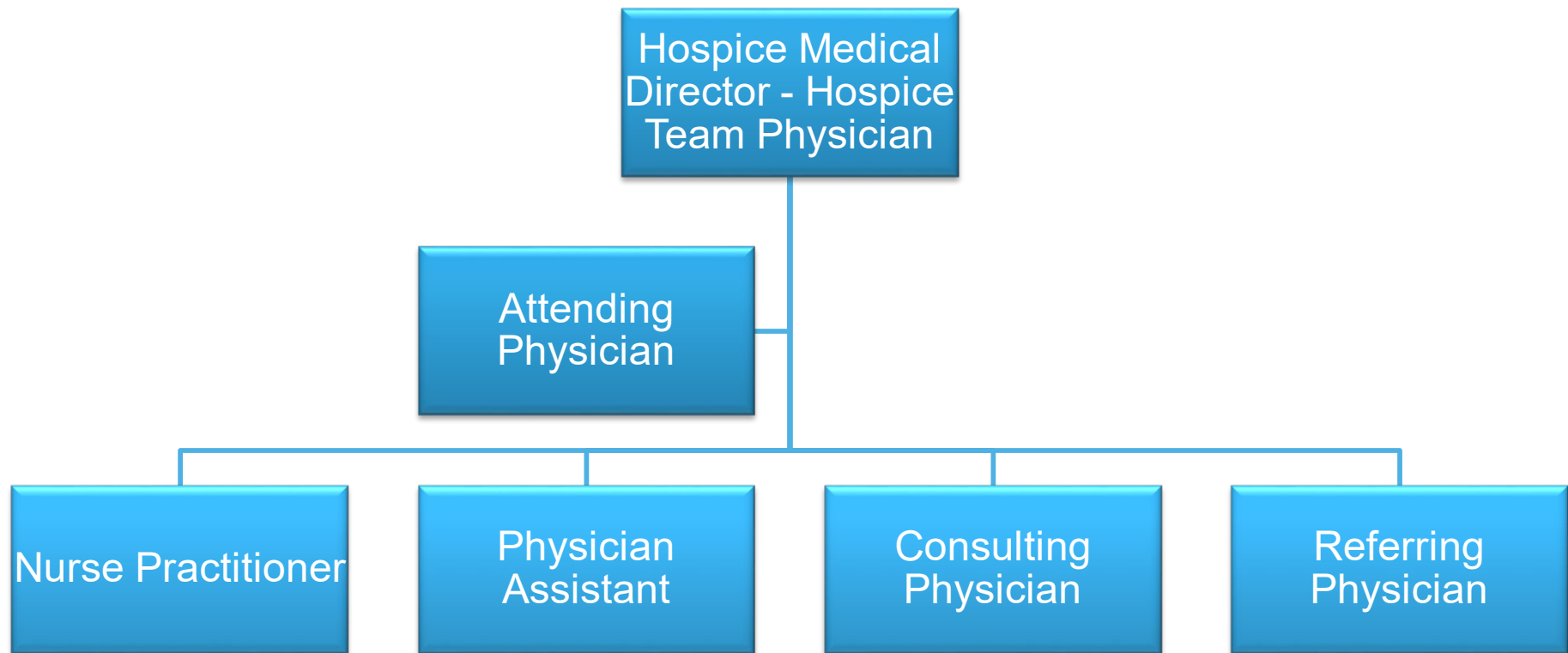
The Role of the Physician in Hospice

As the concept of hospice has evolved in the United States, it has become apparent that there is a significant need for increased physician participation in all aspects of the care of terminally ill patients provided by hospice programs

The increased involvement of physicians in all aspects of hospice and palliative care results in measurable improvement in the quality of patient care that hospice programs provide to terminally ill patients and families all over the United States



Physicians and Nonphysician Practitioners Delivering Hospice Services



Understanding the Role of the Hospice Medical Director - Hospice Team Physician

What is a Hospice Medical Director?

- The official role of hospice medical director was established in 1982 alongside the Hospice Medicare Conditions of Participation (COP)
- Under this federal mandate, all United States hospices participating in the federal Medicare program were required to have a dedicated medical director on staff



Hospice Medical Director - Hospice Team Physician

Doctor of medicine or osteopathy

Must perform physician services

Medical
Director/Hospice
Physician

Cannot be a nurse practitioner or
physicians assistant

Responsibility for the medical
component of the hospice's
patient care program.

Hospice Medical Director - Hospice Team Physician

- Provide initial certification of terminal illness
- Recertify terminal illness
- Conduct face-to-face visits
- Bill for professional services
- Serve as physician member of the IDT
- Communicate with the attending and other providers involved in the care of the patient

Hospice Medical Director - Hospice Team Physician

Other Responsibilities Include

- Maintain current knowledge of the latest research and trends in hospice and palliative care.
- Assure physician representation and participation in the development of a patient's hospice plan of care.
- Participate in family meetings and education sessions.
- Provide clinical leadership in the development and review of clinical protocols and processes.
- Participate in operational and administrative planning process.
- Provide outreach and education to community physicians, other community agencies and health care settings.
- Supervise hospice physician employees and contract hospice physicians.
- Participate in the development and updating of patient care policies and emergency procedures

Hospice Medical Director - Hospice Team Physician



HMDs cannot:

Delegate their work to an NP or PA practicing under their license

Understanding the Role of the Attending Physician in Hospice

The Role of the Attending Physician



Primary care physicians often have a close relationship with their patients. They are in a unique position to provide end-of-life care, which includes recognizing the need for and recommending hospice care when



Important member of the interdisciplinary team

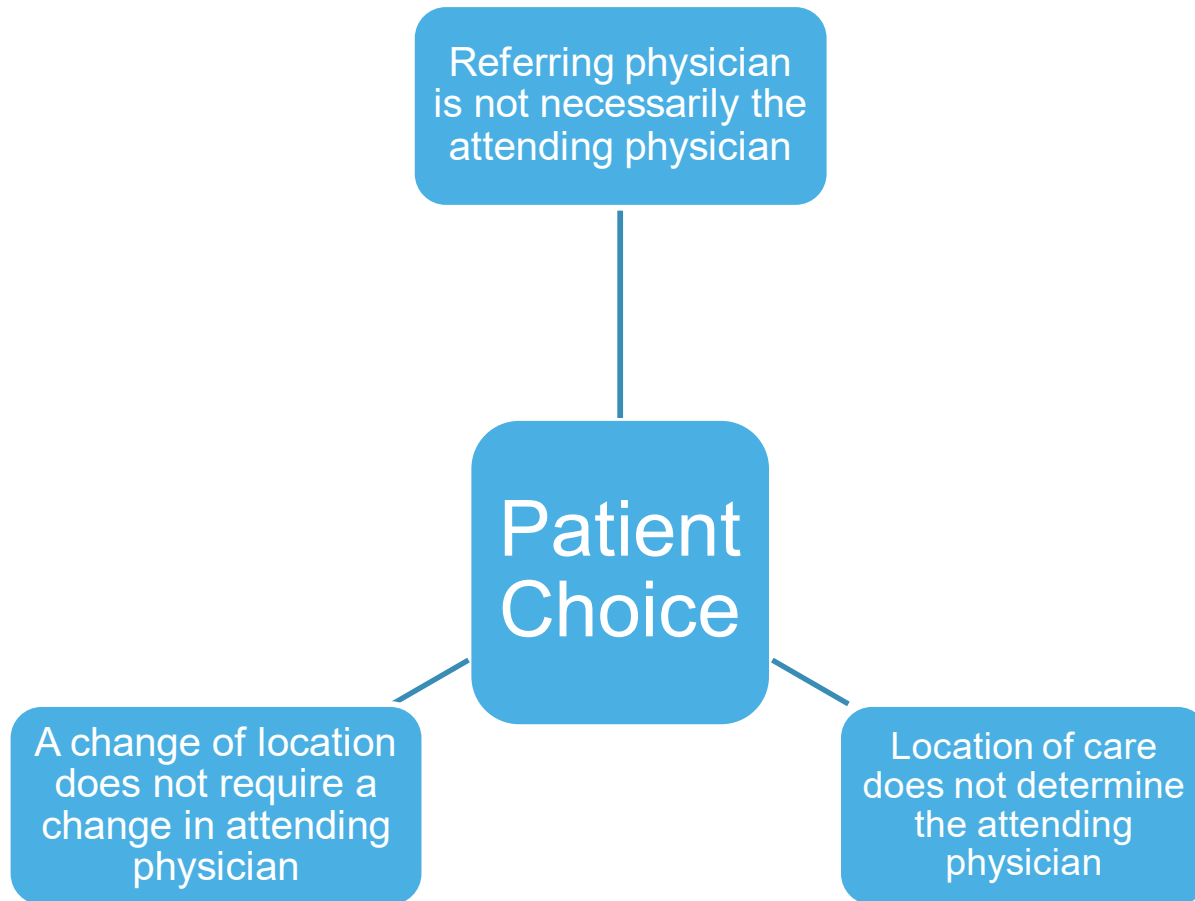


Works collaboratively with their patients designated Hospice agency to provide customized care at the end of life

The Attending Physician

- Hospice attending physician under the Medicare hospice benefit may be:
 - Doctor of medicine or osteopathy
 - Nurse practitioner
 - Physician assistant

The Attending Physician



The Attending Physician

- Attending physician is the selected provider indicated on the beneficiary election statement.
- Required for initial certification but not required for recertification
- Develops comprehensive assessment and plan of care with hospice provider
- Collaborate with the IDT on review, revision and documentation of the individualized plan as frequently as the patient's condition requires, but no less frequently than every 15 calendar days

The Attending Physician

Reminder:

- It is the patient's choice, and influencing this selection for the convenience of the hospice or other providers is a violation of patient's rights.
- If the patient has no physician they want as an attending, or if their choice refuses, they do not have to have an AP - the hospice physician can oversee their medical needs.

Understanding the Role of the Nurse Practitioner in Hospice

The Nurse Practitioner

- A nurse practitioner is defined as a registered nurse who is permitted to perform such services as legally authorized to perform (in the state in which the services are performed) in accordance with State law (or State regulatory mechanism provided by State law) and who meets training, education and experience requirements described in 42 CFR 410.75.

The Nurse Practitioner

The Nurse Practitioner can:

- Conduct face to face encounters (if employed by the hospice)
- Serve as AP if the patient selects them
- Prescribe medications
- Provide consultation and care

The Nurse Practitioner



NPs cannot:

- Certify patients as terminally ill
- Assume the work of the HMD in their absence
- Serve as the HMD or physician member of the IDG
- Bill for services that could have been performed by a registered nurse
- Serve as a CP to the hospice patient

Understanding the Role of the Physician Assistant in Hospice

The Physician Assistant

- A physician assistant is defined as a professional who has graduated from an accredited physician assistant educational program who performs such services as he or she is legally authorized to perform (in the State in which the services are performed) in accordance with State law (or State regulatory mechanism provided by State law) and who meets the training, education, and experience requirements as the Secretary may prescribe.
- The physician assistant qualifications for eligibility for furnishing services under the Medicare program can be found in the regulations at 42 CFR 410.74 (c).

The Physician Assistant

The Physicians Assistant can:

- Provide consultation and care to patients
- Serve as the AP if the patient selects them
- *Prescribe medication:*
 - In accordance with state scope of practice requirements and hospice policy who is:
 - (A) The patient's attending physician; and
 - (B) Not an employee of or under arrangement with the hospice.

The Physician Assistant



PAs cannot:

- Certify or recertify terminal illness
- Complete the face-to-face visit
- Replace the hospice physician in the IDT
- Assume the duties of the HMD in his/her absence

Understanding the Role of the Consulting Physician

The Consulting Physician

- Physicians who are not designated as the beneficiary attending physician, nor are they employed by the hospice may be contracted by the hospice to provide physician services.
- A consulting physician must have a contract with the hospice agency to provide services related to the hospice diagnosis.

The Consulting Physician

Consulting physicians can:

- Provide professional services
- Prescribe medication
- Provide information to the hospice regarding the consultation

The Consulting Physician



CPs cannot:

- Bill the hospice unless a contract is in place
- Bill Medicare Part B if the care is r/t the terminal diagnosis and related conditions
- Certify or recertify as terminally ill

Understanding the Role of the Referring Physician

The Referring Physician

- Often a doctor who does not know the patient well, and/or would not be chosen as the physician that will be involved in ongoing care, is the first person to suggest hospice to the patient and make a referral.
- More often is a hospitalist

The Referring Physician

Referring physicians can:

- Refer a patient to hospice and supply clinical information

Note: The referring physician/hospitalist is not necessarily the attending physician

The Referring Physician



Referring physicians cannot:

- Be automatically assigned as AP by the hospice

Home Health and Hospice Documentation Collaboration



Documentation Collaboration

- Hospice agencies require as much documentation from the referring physician/primary physician and/or the acute/post-acute care facility's medical records as necessary to ensure that patient eligibility criteria are met
- Hospice agencies must be able to provide it to CMS and its review entities upon request



Hospice Documentation Collaboration

- The hospice admits a patient only on the recommendation of the medical director in consultation with, or with input from, the patient's attending physician (if any)
- For an initial hospice election, both the attending physician and the medical director or physician member of the IDG must provide a certification of terminal illness



Hospice Documentation Collaboration

- **Attending Physician and Medical Director/Hospice Physician**
 - Completion of the comprehensive assessment, development of the plan of care as well as updates to the assessment and review of the plan of care
- **Attending Physician**
 - Hospice should be contacting the attending physician for collaboration on the assessment, plan of care and for orders.

Hospice Documentation Collaboration

- The clinical record must contain accurate clinical information about the patient as recorded by hospice staff, the attending physician, the medical director, and any other entities involved with the patient's care.
- **A physician is one of the key documenters in the clinical record and needs to be aware of the requirements in the regulations.**

Wrap Up



To Ask a Question Using the Question Box

The screenshot displays the GoToWebinar interface. At the top, there is a menu bar with 'File', 'View', and 'Help'. Below it is the 'Attendee List (2 | Max 201)' section, which includes tabs for 'Attendees (1)' and 'Staff (1)', a dropdown menu for 'NAMES - ALPHABETICALLY', and a search box. The 'Attendees' tab is active, showing a list with 'Corena Bahr (Me)'. Below the attendee list is the 'Audio' section, which includes 'Audio Mode' options: 'Use Telephone' (unselected) and 'Use Mic & Speakers' (selected). There is also a 'MUTED' indicator and a volume control slider. The 'Talking' section shows 'Talking: Suzie Smith'. The 'Questions' section is the focus, featuring a 'Questions Log' with a question 'Q: Is there a volume discount?' and an answer 'A: Yes! We will send you more info after the event.' Below the log is a text input field containing the word 'Yes' and a 'Send' button. Two red arrows are overlaid on the interface: one pointing to the input field with the text 'Type questions here' and another pointing to the 'Send' button with the text 'Then click Send'.

Hospice Resources



CMS Hospice Resources

- [CMS website, Hospice Center](#)
- [CMS website, Transmittals](#)
- [CMS website, Internet-Only Manuals](#)
 - CMS IOM Publication 100-02, *Medicare Benefit Policy Manual*
 - Chapter 9 (Hospice Coverage)
 - CMS IOM Publication 100-04, *Medicare Claims Processing Manual*
 - Chapter 11 (Hospice Billing)
 - Code of Federal Regulations
 - [Part 418 Hospice Care](#)

National Government Services Website Hospice Resources

Accessing Webinar Materials/Presentations

- Available on [our website](#)
- Select your provider type and applicable state, click on enter.
- From the drop down menu, click on Education for manuals, Medicare Topics (formerly job aids) and Medicare University.
- From the drop down menu, click Events to view and register for upcoming webinars.

Materials from prior webinars are available on our website:

- Click on Events from the drop down, scroll towards the bottom of the page for past events.

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- Subscribe to receive the latest Medicare information



The screenshot shows the website header with the following elements:

- Top right: [NGSConnex](#) | [Subscribe for Email Updates](#) | [HH+H in New Hampshire](#) (dropdown)
- Header bar: [HOME](#) | [EDUCATION](#) (dropdown) | [RESOURCES](#) (dropdown) | [EVENTS](#) | [ENROLLMENT](#) | [APPS](#) (dropdown) |

The main content area features six topic cards:

- Medical Policies**: Find LCDs and related billing and coding articles
- Enrollment**: Getting started, after you enroll, and revalidating your enrollment
- Fee Schedules & Pricers**: Code pricing search, payment systems, limits, and fee schedule lookup
- Claims and Appeals**: Learn about claims, top errors, fees, MBI and appeals
- Overpayments**: Repayment schedules, and post-pay adjustment
- Medicare Compliance**: Medical Review, Prior Authorization, Fraud & Abuse, CERT, and more

National Government Services Website Contact information

Accessing contact information

- Available on [our website](#)
- Select Resources, click on “Contact Us”

Options available for selection:

- NGSConnex
- Interactive Voice Response (IVR)
- Provider Contact Center (PCC)
- Mailing Addresses

Contact Us

- Email: J6.provider.training@anthem.com

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Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont	866-289-0423 Hearing impaired callers with TTY equipment only may call our TTY Line at 866-786-7155	866-275-7396	Monday-Friday* 8:00 a.m.-4:00 p.m. ET *Closed for training on the 2 nd and 4 th Friday of the month. 12:00-4:00 p.m. ET
Michigan, Minnesota, New York, New Jersey, Wisconsin, Puerto Rico, U.S. Virgin Islands	866-590-6728 Hearing impaired callers with TTY equipment only may call our TTY Line at 888-897-7523	866-275-3033	Monday-Friday* 8:00 a.m.-4:00 p.m. CT 9:00 a.m.-5:00 p.m. ET *Closed for training on the 2 nd and 4 th Friday of the month. 11:00 a.m.-3:00 p.m. CT 12:00-4:00 p.m. ET

Thank You!

- Follow-up email
 - Attendees will be provided a Medicare University Course Code
- Questions?

