



Part D Pilot Description and Recruitment

Descriptive language for EMR Vendors to send to clients requesting volunteers

Jan 27, 2022

CMS/RelayHealth Part D Pilot Project

Background: For a number of years, CMS has been concerned about spending outside the hospice benefit once a Medicare beneficiary enrolls in hospice. In the FY 2022 Hospice Wage Index and Quality Reporting proposed rule, published in April 2021, CMS reported that in 2019, the amount of Part D spending reached almost \$500 million (\$498,913,448). One of the concerns identified by CMS Part D is that information on the hospice election does not reach the Part D plan quickly, so that the Part D plan frequently has no knowledge that an enrollee has elected their hospice benefit. A study of this issue by one Part D plan and presented to CMS found that the median time from submission of the Notice of Election (NOE) by the hospice to Part D knowledge of the hospice election as 16 days and could be as much as 65 days.

CMS Part D has contracted with RelayHealth to design a hospice election notification system so that Part D plans will know of the hospice election in a more timely way. With this awareness, the Part D plan is aware of the hospice election and can address prescriptions which are paid by Part D when the drug may be related to the hospice patient's terminal illness and related conditions and should be paid by the hospice rather than the Part D Plan.

Why this project is important: The HHS Office of Inspector General (OIG) has issued two reports on the amount of spending in Part D after the hospice election. The OIG recommendations to CMS were strong and suggest that CMS Part D develop solutions to the problem. If no solution is found, it is likely that there will be increased scrutiny of hospices with beneficiaries that have high Part D costs. This project is designed to address the concerns of the OIG.

The pilot project: CMS contractor RelayHealth has been working to develop the mechanism to communicate hospice NOE information to the Part D plans by serving as a transaction facilitator. NHPCO and NAHC recruited three hospice EMR vendors, Axxess, MatrixCare and Netsmart, to be a part of the pilot to transmit hospice election information through RelayHealth to Part D plans, with the hope that the time from Notice of Election to Part D notification of the hospice election can be shortened significantly.

The opportunity: The three EMR vendors are all recruiting hospice providers to be part of this project who submit NOE data electronically to Medicare using the 837I transaction standard. As a part of the pilot project, your hospice will have the opportunity to be part of solving a difficult communication issue for hospice and Part D. **Volunteers are needed now!** Once volunteers from each EMR vendor have been identified, each provider will receive additional direction from the EMR vendor and RelayHealth. The pilot is interested in hospices who use a clearinghouse to submit electronic NOE data as well as

those who submit directly to their MACs. When this project moves from the pilot phase to final, testing for the various ways that NOE information gets into the system will be important.

Pilot Test Phase I:

- **Beginning today:** Hospices requested to volunteer with their EMR vendor
- **February 7 to March 31, 2022:** Connectivity for NOE file transfer is set up with the sending entity (i.e., Clearinghouse or provider if provider is sending NOE files directly)
- **Starting April 1 but no later than June 5:** NOE file transmissions are submitted to RelayHealth from clearinghouses or providers that send directly to CMS
- **Week of June 27th:** RelayHealth will provide education to hospice pilot test participants on the Hospice status reports that are to be generated in Phase II of the pilot test.

Pilot Test Phase II- July 1

- **July 1:** RelayHealth will send NOE data from the historical file transmissions submitted by Clearinghouses and/or providers between May 1 and July 1 to the Medicare Part D plans
- **Beginning July 1:** Hospice entities:
 - should continue to send NOE files to RelayHealth via their existing submission method
 - will begin receiving status reports from RelayHealth for the NOE file transactions submitted to the Medicare Part D plans

The work effort:

We believe that minimal work will be needed from Hospice providers to participate in this pilot test initiative. Participation will involve coordinating the submission of provider electronic NOE files to Relay Health via existing methods (i.e., Clearinghouses, direct to MAC, other) and validating the acceptance of such electronic NOE files and transactions via RelayHealth generated provider status reports.

Volunteering for the pilot: Your EMR vendor will need a primary contact who will be responsible for providing the necessary approval to the clearing house to participate on your behalf or if submitting NOE files direct, to coordinate the required connectivity set-up.

The primary contact will need to provide an email address for receipt of the status reports that will be generated by RelayHealth along with the following additional information:

1. NPI
2. Organization name
3. Primary Contact First Name
4. Primary Contact Last Name
5. Phone number
6. Email address