

PUBLIC SUBMISSION

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Docket: CMS-2014-0126

(CMS-10538) Prior Authorization Form for Beneficiaries Enrolled in Hospice

Comment On: CMS-2014-0126-0002

Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: CMS-2014-0126-DRAFT-0005

MN

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General Comment

Comments for CMS-10538

UCare, a Medicare Advantage-Part D Organization, offers the following comments regarding CMS-10538 Prior Authorization Form for Beneficiaries Enrolled in Hospice. The purpose of this form is listed as providing information for a Part D sponsor to establish coverage of drugs under Part D. We believe that the use of this form is and will also be used to inform Medicare Advantage Organizations (MAO) of the election of revocation of hospice. Since the draft form was released, we have already received notice of hospice election using this method.

We suggest that written documentation of the hospice election or revocation be required, rather than a verbal notification. We are concerned that a verbal notification could result in multiple changes of a member's hospice status without confirmation. A member, family member or provider could call a MAO to inform of a hospice election or revocation one day then this information could change the following day. This would create an administrative burden for the MAO and delay services for the member.

We request that CMS issue instructions on actions a MAO should take if the form is incomplete and/or not signed. Is the MAO still required to accept the change if the form is not complete?

We request that CMS issue instructions for MAOs on how to reconcile the PDEs if and when the

hospice information is retroactively changed.

We request that CMS develop a process to reconcile the differences in the data MAOs have and what CMS has. A process is needed for MAOs to report to CMS when the MAO receives the best available evidence and the hospice status has not been updated on the TRR.

We suggest that the Prior Authorization Form be electronic and allow for submission directly to CMS. We also suggest that the form incorporate the Notice of Election (NOE) and Notice of Termination/Revocation (NOTR) on the same form.

Specifically on the Draft Form, we offer the following comments:

Update the title to read HOSPICE INFORMATION FOR MEDICARE ADVANTAGE AND PART D PLANS

Remove the Plan Sponsor Website Link section

Add Hospice before Admit Date

Add Hospice before Discharge Date

Add Hospice before Primary Diagnosis

Include section for diagnosis code, in addition to the written diagnosis

Add Hospice before Secondary Diagnosis