# *Post-Boot Camp Checklist*

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| **Hospice** |  |
| **Name** |  |
| **Date** |  |

|  | **ACTIVITY** | **COMMENTS** |
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| CONDUCT A “DESK REVIEW” OF ALL SIGN-ON FORMS/TEMPLATES |
|  | The *Notice of Election / Election of Benefits* form contains all required elements |  |
|  | The attending physician *Initial Certification of Terminal Illness* form contains all required elements, including the placement of said elements on the form |  |
|  | The hospice physician *Initial Certification of Terminal Illness* form contains all required elements, including the placement of said elements on the form |  |
|  | The *Recertification of Terminal Illness* form contains all required elements, including the placement of said elements on the form |  |
|  | The *Physician Narrative* form/template contains all required elements, including the correct attestation language and the placement of all required elements on the form/template |  |
|  | The physician *Face to Face Encounter* form/template contains all required elements, including the correct attestation language and the placement of all required elements on the form/template |  |
|  | The nurse practitioner *Face to Face Encounter* form/template contains all required elements, including the correct attestation language and the placement of all required elements on the form/template |  |
|  | The *Plan of Care* form/template contains all required elements |  |
|  | All forms/templates contain a revision date, and keep historical archives |  |
|  | Historical archives of all forms/templates are maintained |  |
|  | All outdated forms/templates are immediately and completely removed from circulation (e.g., storage areas, desk drawers, filing cabinets, staff cars, pre-made “packets”, etc.) |  |
| CLINICAL RECORD AUDITING |
|  | Develop and implement a process for conducting all clinical record audits on a **pre-billing** basis |  |
|  | Develop and implement a clinical record audit tool to evaluate compliance with all “technical” (i.e., billing-related) requirements |  |
|  | Develop and implement a clinical record audit tool to evaluate whether physician and interdisciplinary documentation supports “medical necessity” (i.e., prognosis of 6 months or less if the terminal illness runs its normal course) |  |
|  | Develop and implement a clinical record audit tool to evaluate whether documentation associated with higher levels of care (i.e., general inpatient care and continuous home care) fulfill the *needed* and *provided* requirement, and justify payment |  |
|  | Develop and implement a clinical record audit tool to evaluate compliance with the CoPs |  |
|  | Ensure that the “technical” clinical record audit tools are updated with any applicable regulatory changes, including the effective dates |  |
|  | Ensure that the “medical necessity” clinical record audit tools are updated with any changes to Local Coverage Determination (LCD) guidelines |  |
|  | Ensure that the higher levels of care clinical record audit tools are updated with any applicable regulatory changes, including the effective dates |  |
|  | Ensure that the CoPs clinical record audit tool is updated with any applicable regulatory changes, including the effective dates |  |
|  | Develop an audit protocol and train all auditing staff regarding the proper use of the audit tools |  |
|  | If auditing clinical records associated with **previously billed claims**:* Consider engaging an attorney and conducting audits under “attorney-client privilege”
* Discuss your concerns with counsel (e.g., why you want to audit previously billed claims, etc.)
* Strategized with counsel regarding the audit, its findings, and any required actions (e.g., self-disclosure and repayment, etc.)
* Identify the relevant time frame (i.e., dates of service to be audited)
* Establish an appropriate audit sample (e.g., sample size, selection criteria, random vs. RAT-STAT, etc.)
* Create an appropriate audit tool (e.g., ensure that the “then-current” regulatory requirements and effective dates are reflected in the audit tool, etc.)
* Develop an audit protocol and train all auditing staff regarding the proper use of the audit tools
* Determine whether the dates of service and/or sample need to be expanded based on audit findings
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