

CMS Delays Implementation of the Hospice Certifying Physician Enrollment Requirement

Source: NAHC, April 26, 2024

The May 1 go-live date for the Medicare hospice certifying physician enrollment requirement is delayed until June 3. The Centers for Medicare & Medicaid Services (CMS) notified NAHC and NHPCO today of this decision and will be making a public announcement soon. This follows our continued engagement with CMS to ensure the seamless and appropriate implementation of this requirement.

The hospice physician enrollment requirement was originally set to begin on May 1, as finalized in the [Fiscal Year \(FY\) 2024 Hospice Wage Index final rule](#) final rule. Under this requirement, a physician must be Medicare enrolled or validly opted-out in order to certify a patient's terminal illness under the Medicare hospice benefit.

As previously reported, the implementation of this requirement caused quite a stir within the hospice community. NAHC and NHPCO have been working together to address the many issues and unintended consequences of the requirement, and had a meeting this week with CMS where we relayed these concerns and requested the following from CMS:

- Expedient and clear guidance.
- Flexibility in claim processing.
- Part B MAC physician enrollment processing guidance.

Following the CMS announcement, NAHC and NHPCO released the following statement:

- “The National Association for Home Care & Hospice (NAHC) and the National Hospice and Palliative Care Organization (NHPCO) welcome CMS’ announcement to delay the implementation of the Medicare hospice certifying physician enrollment requirement from May 1 to June 3. Earlier this week, NAHC and NHPCO met with CMS to relay the concerns of the provider community and request expedient and clear guidance, flexibility in claim processing, and Part B Medicare Administrative Contractor (MAC) physician enrollment processing guidance. Both organizations thank CMS for the resulting delay in

implementation and look forward to continued engagement on these issues to ensure seamless and appropriate implementation of the requirement.”

NAHC is expecting to see clarified instructions for claims processing and guidance on physician enrollment application processing. We will provide more information as it becomes available. Until then, hospices should continue to implement procedures to ensure that the certifying physician(s) is enrolled in Medicare or validly opted-out.