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Home Health & Hospice Billing Specialists

How to get the NOA requirements right

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*This Webinar is for Medicare Certified Home Health Agencies

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Objectives

Learning Objectives:

1. Requirements and Details on filing an NOA
2. What is the difference between an NOA & RAP
3. Penalties for late filing NOA
4. Action Steps


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RAPS vs NOA

Current 2021 No PAY RAP:

- Currently agencies are billing RAPs - Type of Bill (TOB) 322
- for each 30-day payment period

Effective 2022 NOA (Notice of Admission):

- NOA – TOB (32A) will be required for periods of care beginning on and after January 1, 2022.
- Similar to the No Pay RAP Process
 - 5 day submission of NOA is still required
 - Penalties applied for late submission of NOA
 - Exception it's a one-time NOA submission


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NOA

- Establishes Home Health “Admission Period”
 - From date through the D/C date
- Only one NOA is required for any series of HH periods of care beginning with admission to home care and ending with discharge.
- If a patient is D/C and then readmitted to the agency a new NOA is required within 5 calendar days of the new SOC
- Final Claims for every 30 day period are still required for payment

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NOA Requirements

- One-time submission upon SOC
- Can be keyed directly into DDE or Billed through your software
- Must be submitted timely
 - A *timely-filed NOA must be **accepted** by the MAC (HHH) within five calendar days after admission date.*

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NOA & Claim Submission



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NOA Requirements

- *The HHA can submit an NOA to Medicare when:*
 - *The HHA has obtained a verbal or written order from the physician that contains the services required for the initial visit, and*
 - *The HHA has conducted an initial visit at the start of care.*

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NOA Non-Timely filing Penalties

- In instances where an NOA is not timely-filed, Medicare shall reduce the payment for a period of care, including outlier payment, by the number of days from the home health admission date to the date the NOA is submitted to, and accepted by, the A/B MAC (HHH), divided by 30.
- This reduction shall be a provider liability, and the provider shall not bill the beneficiary for it.

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NOA Penalty Exceptions

CMS exceptions policy for failure to meet timely filing of the NOA; an HH may be eligible for an exception to the consequences of late filing of the NOA if it documents and requests an exception based on 4 circumstances listed below and the MAC grants the exception:

- Fires, floods, earthquakes, or other unusual events that inflict extensive damage to the HHA's ability to operate;
- An event that produces a data filing problem due to a CMS or MAC systems issue beyond the control of the HHA;
- A newly Medicare-certified HHA that is notified of that certification after the Medicare certification date, or which is awaiting its user ID from its MAC; or
- Other circumstances determined by CMS to be beyond the control of the HHA

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Implementation of NOA

- Patients Continuing Care in 2022
 - the HHA shall submit an NOA with a one-time, **artificial 'admission' date** corresponding to the **"From" date** of the **first period in 2022**.
 - For example, if the start of care is 12.13.21, the first 30-day period of care runs from 12.13.21 – 01.11.22.
 - You would need an NOA on 01.12.22 for a new period in CY2022.

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Implementation of NOA



- Start of Care: 12.13.21
- 30-day Period of Care: 12.13.21 – 01.11.22



Submit an NOA with an admission date of 01.12.22 for the next 30-day period of care

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Implementation of NOA

Transition of NOA in January 2022

- Educate your billing team on NOA and specifically on the transition guidance
- Prepared for increased work in January
- Be prepared for errors by the MAC during the implementation period for NOA
- Be mindful of the 5 calendar day submission requirements to avoid penalties

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Thank You for Attending



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