

# UnitedHealthcare Medicare Advantage hospice VBID

In-network provider guidance

## Purpose

This document is intended to provide guidance to in-network hospice providers serving UnitedHealthcare members whose plans are included in the hospice benefit component of the Center for Medicare and Medicaid Innovation (CMMI) Value-Based Insurance Design (VBID) demonstration.

The CMMI hospice VBID model aims to achieve the following outcomes:

- Enable a seamless continuum of care for members electing hospice care and help ensure that hospice enrollees do not need to initially decide between continuing the curative care they are receiving or enrolling into hospice care without curative services
- Improve the quality of members' transitions into hospice care and help ensure that members enroll in quality hospices at the most appropriate time during their care journeys
- Foster innovative partnerships between Medicare Advantage Organizations (MAOs) and hospice providers

## Scope

This document applies to in-network providers serving UnitedHealthcare Medicare Advantage (MA) members in the following plans. Please note that member plan numbers can be found on their UnitedHealthcare member ID card.

Guidance related to Corpus Christi, Texas is forthcoming.

State	Area	Centers for Medicare & Medicaid Services (CMS) contract
Alabama	All	H0432-003-000, H0432-004-000, H2802-041-000, H6528-033-000, H0432-012-000, H0432-010-000, H0432-009-000, H2802-044-000, H0432-013-000
Illinois	Chicago	H8768-005-000, H8768-010-000
Oklahoma	All	H3749-001-000, H3749-017-000, H3749-018-000, H3749-020-000, H8768-008-000, H8768-009-000, H8768-016-000, H8768-028-000, H5322-031-000, H8125-003-000

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# UnitedHealthcare hospice VBID model overview

Starting Jan. 1, 2022, the hospice benefit component of the Centers for Medicare & Medicaid Innovation (CMMI) Value-Based Insurance Design (VBID) model will change the UnitedHealthcare Medicare Advantage member's benefits and how hospice services are billed in certain states. The hospice VBID demonstration tests a hospice "carve-in" model that shifts risk and responsibility for hospice care from the Centers for Medicare & Medicaid Services (CMS) to Medicare Advantage Organizations (MAOs). Under the model, hospices will continue to provide the services that CMS classifies as being covered in the hospice per diem payment.

Under the hospice VBID model, in states and jurisdictions where UnitedHealthcare has been approved to offer such benefits, UnitedHealthcare will be responsible for coverage and payment of all hospice-related services for UnitedHealthcare Medicare Advantage members that were formerly covered by Original Medicare. Members will remain enrolled in UnitedHealthcare Medicare Advantage while receiving hospice services.

The hospice VBID model aims to ease care transitions, improve quality and timely access to the hospice benefit, and remove barriers to both palliative and hospice care so that members may choose hospice at a more appropriate time in their care journey. Under this model, UnitedHealthcare will offer additional services that may not be currently included in the Original Medicare coverage for hospice. When a member elects to enroll in an in-network hospice, additional benefits such as transitional concurrent care (i.e., transitional curative services) and continued care navigation will be available to them — these benefits are not available if a member elects hospice with an out-of-network provider. The hospice VBID model focuses on creating a more seamless transition into end-of-life care through improved continuity and transitional care for our members during their Medicare Advantage experience.

## Eligibility

### Confirming a member's eligibility

Before Jan. 1, 2022, and for plans outside the VBID model, when a Medicare Advantage plan member elects to enter hospice, Original Medicare is financially responsible for most Medicare-covered services. UnitedHealthcare is financially responsible for some services unrelated to the terminal illness.

Beginning Jan. 1, 2022, when an eligible member of one of the following UnitedHealthcare Medicare Advantage plans elects to enter hospice, UnitedHealthcare will be financially responsible for hospice services.

State	Area	Centers for Medicare & Medicaid Services (CMS) contract
Alabama	All	H0432-003-000, H0432-004-000, H2802-041-000, H6528-033-000, H0432-012-000, H0432-010-000, H0432-009-000, H2802-044-000, H0432-013-000
Illinois	Chicago	H8768-005-000, H8768-010-000
Oklahoma	All	H3749-001-000, H3749-017-000, H3749-018-000, H3749-020-000, H8768-008-000, H8768-009-000, H8768-016-000, H8768-028-000, H5322-031-000, H8125-003-000

The presence of a contract number that matches a contract listed above does not mean that the member is still active in the plan. Eligibility still needs to be confirmed real time.

Hospice providers can confirm member eligibility real time by checking a member's plan through the HIPAA Eligibility Transaction System (HETS) through CMS or by signing in at [UHCprovider.com/eligibility](https://UHCprovider.com/eligibility).

## HIPAA Eligibility Transaction System (HETS) | CMS

### Plan changes

If a member, who is in an active hospice election, chooses to switch to another participating plan, the hospice benefit coverage will remain. However, if the member chooses to “opt-out” of the MAO plan to Original Medicare (i.e., special enrollment periods) or move into a non-participating plan, then the original plan will cover hospice and hospice-related services through the end of the month.

Hospice providers should regularly review patients' coverage for continual awareness of the benefits associated with their plan, and to remain aware of any plan changes.

### Hospice termination and re-election

Claims for members enrolled in hospice on or before Dec. 31, 2021, will continue to be paid by Original Medicare if the member's hospice election remains active. Claims should continue to be sent only to the Medicare Administrative Contractor (MAC).

Payment will be covered by UnitedHealthcare for eligible services. Only members who elect hospice on or after Jan. 1, 2022, will be included in the model.

If a member revokes their hospice election and subsequently elects hospice on or after Jan. 1, 2022, they will be included in this model, and both notices and claims should be sent to both the MAC and UnitedHealthcare.

### Hospice pre-approval

UnitedHealthcare does not require members to receive pre-approval for hospice care.

UnitedHealthcare coverage of hospice services is not conditioned on a member receiving pre-approval for hospice services. In accordance with 42 CFR § 418.22, hospice providers will continue to obtain certification of terminal illness.

### Prior authorizations

Prior authorizations for hospice services are not required from participating Medicare Advantage plans.

Information on authorizations for transitional concurrent care (TCC) services is outlined in detail in the following section, “Transitional concurrent care services.”

# Palliative care

Today, and in 2022, UnitedHealthcare offers qualifying members home-based palliative care services through Prospero Health. The program is available to members with advanced illness who have begun a process of progressive and significant decline. It is meant to help bridge gaps for those who are not ready or clinically appropriate for a hospice level of care but need additional supportive services. The interdisciplinary care team co-manages directly with the member's primary care provider (PCP) and specialists to manage pain, symptom relief and clinical interventions.

Unlike the Medicare hospice benefit, palliative care does not have a prognosis restriction and may be provided together with curative treatment at any state of a serious illness.

The goal of palliative care is to improve quality of life for those living with serious illness and their families and caregivers by providing specialized medical care, support and relief from the symptoms and stress of a serious illness, while allowing the necessary space and time for enrollees to understand their care choices and decide on a plan of care that best reflects their needs and wishes.

In addition to the benefits that are currently covered by MAOs today, participating VBID plans must also include palliative care and a strategy for advanced care planning, both of which CMS sees as paths to improving end-of-life care. The VBID model requires that UnitedHealthcare has a strategy for engaging members in non-hospice palliative care services. The UnitedHealthcare strategy includes continuing to work with Prospero to provide home-based palliative care services for qualified members.

## Referring UnitedHealthcare members to a UnitedHealthcare palliative care program

If it is determined that a member is not ready for hospice care, they may be a candidate for a UnitedHealthcare palliative care program.

For VBID plan members in Alabama, Illinois (Chicago) and Oklahoma, referring physicians or hospice agencies are to send the referral and patient's demographic information to Prospero via the following methods:

- **Email:** [referrals@prospero-health.com](mailto:referrals@prospero-health.com)
- **Phone:** 888-608-0499
- **Fax:** 866-893-6646

## Palliative program transitions to hospice

While Prospero co-manages with the patients' PCPs, they do have the capability to act as the PCP for those patients who do not have one. Prospero's comprehensive care is provided through an interdisciplinary team of physicians (board certified in internal medicine, geriatrics, palliative care and/or hospice), nurse practitioners, nurses and social workers.

The Prospero team is available to patients, families and providers 24/7 for any needs. Additionally, Prospero partners with other medical providers and specialty physicians and community providers to coordinate all aspects of care to help ensure patients and caregivers are supported where they are most comfortable — at home.

Prospero will provide continual support to patients across the informational, referral and enrollment processes as patients and their families consider if hospice care is the right choice. Prospero will educate patients about their in- and out-network provider options and will also coordinate with the

patient upon selecting and confirming the curative care services that will be included in their transitional concurrent care plan (if the member utilizes this benefit).

### **Pre-hospice consultation via Prospero palliative**

A pre-hospice consultation is designed to assist members and/or caregivers by providing information and education on end-of-life care options, including hospice. A pre-hospice consultation is an **optional** benefit available 24/7 to **all** members in participating plans. Members receiving Prospero medical services also have the option of receiving the pre-hospice consultation as part of their service offering.

Prospero members can receive a pre-hospice consultation by reaching out directly to their Prospero care provider. Or, to be connected to a member of the UnitedHealthcare pre-hospice consult team at Envoy Care Advocates, a member can call the number on the back of their insurance card, or call the pre-hospice consultation team directly at 833-753-2970.

## **Pre-hospice consultation**

### **What to expect during a pre-hospice consultation**

The pre-hospice consultation is an **optional** benefit available 24/7 to **all** members in participating plans, regardless of if they are receiving Prospero palliative medical services. All members can access United's pre-hospice consult team (Envoy Care Advocates) by calling the number on the back of their insurance card, or by calling the pre-hospice consultation team directly at 833-753-2970.

Pre-hospice consultations will include topics such as:

- General overview of hospice
- Available services through hospice
- Hospice enrollment process
- Collaboration with patient's primary care provider
- Information about in- and out-of-network hospice providers and options
- Value of in-network hospice providers, including:
  - Quality
  - Transitional concurrent care

The value of the UnitedHealthcare hospice network will be emphasized during the consultation, and members will be informed that transitional concurrent care services are only available when they choose an in-network hospice.

The member owns the decision to elect hospice, as well as the hospice selection. UnitedHealthcare, nor the hospice can make or change the member's hospice election.

Additional information about the voluntary pre-hospice consultation can be found within the CMMI RFA and Technical and Operational Guideline documents at [innovation.cms.gov/innovation-models/vbid](https://innovation.cms.gov/innovation-models/vbid).

## **Hospice VBID model benefits for members choosing an in-network provider**

Participating health plans must pay all eligible hospice claims for members who elect hospice at an in- or out-of-network hospice in 2022. However, members can receive additional benefits if they



choose in-network hospices. Members can learn about their in- and out-of-network options during the pre-hospice consultation.

## **Transitional concurrent care services**

Under the VBID model, members who select a hospice in the UnitedHealthcare network may be eligible to continue a subset of short-term curative care services after hospice election, called transitional concurrent care services. These services help members choose hospice services at the appropriate time in their care journey and allow members to continue certain treatments from other providers (i.e., community providers) for a limited time, that would not normally be covered by Medicare, while transitioning to hospice. Members may be eligible for these transitional care services during the first 30 days of hospice care.

## **When transitional concurrent care services are appropriate**

Transitional concurrent care may be appropriate if a member is ready for hospice, but hesitant to abruptly discontinue curative services or treatments. Transitional concurrent care helps remove this barrier for a member electing hospice at a time that aligns with their wishes.

If you are unsure if transitional concurrent care services are appropriate for a UnitedHealthcare member, call **833-753-2970** for additional discussions and support.

## **Hospice provider's role in coordinating transitional concurrent care**

In the VBID model, hospice providers help manage transitional concurrent care — just as they help manage member care plans today. Hospices do not provide transitional concurrent care, but they do work with members to create transitional concurrent care plans and manage care with non-hospice providers. In-network hospice providers will support members and their families in understanding when transitional concurrent care may be appropriate and beneficial to a member's entry to hospice.

Hospice health care professionals should not bill for transitional concurrent care services because those continuing services will be provided and billed by separate community providers.

UnitedHealthcare will reimburse community providers directly for eligible transitional concurrent care services.

## **Creating a transitional concurrent care plan**

Hospice providers will support the member in understanding the benefits and appropriateness of transitional concurrent care, and appropriate transitional services will be assessed on an individual basis. A transitional concurrent care plan will be established for each member who utilizes transitional concurrent care services in an in-network hospice. The transitional concurrent care plan will be established in a way that addresses the member's unique needs based on diagnosis, clinical indication and previous utilization as part of the Transitional Concurrent Care Addendum, and as a component of the patient's hospice plan of care.

The hospice provider will coordinate with the referring providers, community providers and other members of the existing care team to define a plan for the tapering of transitional care and services. Additionally, the Envoy Care Team will partner with hospices, referring providers, community providers and members to educate on what services are available during transitional concurrent care. Hospices will receive verbal approval for transitional concurrent care services from the Envoy Care Team prior to submitting the Transitional Concurrent Care Addendum to UnitedHealthcare.

These services may be included in transitional concurrent care plans as appropriate/necessary to help in reducing physical deterioration, improve quality of life and support positive patient engagement with hospice. Along with these services, the Envoy Care Team will continue to have direct contact and collaboration with the members' other providers (i.e., hospice providers, PCPs, specialists) to help ensure ongoing care collaboration and coordination.

### **Approval of transitional concurrent care**

If the hospice provider believes that transitional concurrent care is appropriate for the member, the provider must notify the Envoy Care Team prior to the member receiving services. We recommend that the discussion with the member about transitional concurrent care services take place as part of the member's intake into hospice, and the hospice provider is to call the Envoy Care Team for real-time approval at 833-753-2970.

During the phone call, the Envoy Care Team will review the appropriateness of the requested curative services/treatments upon receiving the request for the services, and approval must be received by the hospice prior to the member initiating services.

If approval is received, the hospice provider must submit a Transitional Concurrent Care Addendum within 3 calendar days of approval and hospice admission.

Standard plan cost sharing will apply to any transitional services.

### **Transitional Concurrent Care Addendum**

UnitedHealthcare will provide a Transitional Concurrent Care Addendum document to in-network hospices for use during the demonstration. The purpose of the Transitional Concurrent Care Addendum is to help ensure all parties are notified, in writing, of those conditions, items, services and drugs that will be covered under the transitional concurrent care model by UnitedHealthcare.

The Envoy Care Team will review the signed addendum statement upon submission for reconciliation against the pre-approved plan. The hospice provider is required to submit a Transitional Concurrent Care Addendum within 3 calendar days of the authorization of coverage and hospice admission. The Transitional Concurrent Care Addendum must identify the concurrent care services that the member will receive as they transition into hospice and the date treatment will discontinue.

Under the hospice VBID model, hospice providers must submit the Transitional Concurrent Care Addendum to UnitedHealthcare. The addendum is to be submitted by secure email to [tcc@envoycareadvocates.com](mailto:tcc@envoycareadvocates.com) within 3 calendar days of hospice admission date.

### **Prior authorizations for transitional concurrent care**

Participating Medicare Advantage plans cannot require prior authorization for a member to receive hospice care. However, participating plans can require prior authorization for certain non-hospice services that a member may receive that are documented in their transitional concurrent care plan while enrolled in hospice care. Non-hospice providers should continue to follow the prior authorization requirements currently enforced on various non-hospice care services. Services that may require prior authorization would include, but may not be limited to, certain services within the following categories:

- Cancer support care
- Cardiology
- Chemotherapy
- Injectable drugs



- Ventricular assist devices
- Radiology
- Surgical procedures
- Durable medical equipment
- Transplants
- Behavioral health

Please note that prior authorization from a non-hospice provider does not automatically approve a member for hospice transitional concurrent care services. Authorization of the transitional concurrent care plan does not replace the need for the treating provider to obtain a prior authorization.

### **Ongoing transitional concurrent care management**

The Envoy Care Team will communicate with the hospice provider to review the transitional concurrent care plan during care coordination/case conference meetings at least every 14 days while transitional concurrent care services are being utilized to help ensure all updates to the care plan are captured and tapering of services is occurring appropriately. The Envoy Care Team will also review, approve and monitor any post-admission changes to the transitional concurrent care plan within the 30-day time frame that continued curative services are allowed.

### **Care navigation**

For members who elect hospice care as part of the VBID benefit from an in-network hospice provider, UnitedHealthcare will provide navigation support services through the Envoy Care Team to support timely and smooth transitions to hospice and support members and their families after the hospice election.

The Envoy Care Team will support in-network hospices, members electing hospice and their families in the following ways:

- Coordinate with physicians to facilitate completion of necessary certifications and documentation
- Coordinate with hospice providers to minimize administrative burden and facilitate a timely and streamlined transition to hospice for members
- Support in-network hospices with coordination of transitional concurrent care services
- Address any questions or concerns members or families may have, as appropriate

The Envoy Care Team will maintain ongoing coordination with in-network hospices for the duration of the hospice election. Touchpoints with hospices include:

- An initial case conference conducted by the Envoy Care Team once the Notice of Election has been submitted and received by UnitedHealthcare
- Case conferences with hospice providers to discuss member's utilization of benefits, plan of care including use of transitional concurrent care services and any potential issues or concerns on a biweekly basis

The goal of care navigation is to support our members' care experience and needs through coordination with the hospice interdisciplinary team. Neither UnitedHealthcare nor Prospero will establish a separate care plan for members during their hospice election.

For any care navigation inquiries and support, the Envoy Care Team can be reached at 833-753-2970.

# Notices and claims

Under the hospice VBID model, CMS requires hospice providers to submit required notices and claims to **both the Medicare Administrative Contractor (MAC) and to UnitedHealthcare.**

These notices include:

- Notice of Election (NOE)
- Notice of Termination or Revocation (NOTR)
- Notice of Transfer

Please see submission guidance for each in the corresponding sections below.

All notices and claims should be sent to UnitedHealthcare electronically. The method of transmission should be via electronic data interchange on the 837, directed to the UnitedHealthcare Payer ID. The Payer ID can be found on the back of the member's ID card. For Illinois, Alabama and Oklahoma plans included in the model, the Payer ID is 87726.

## **Hospice providers are to submit both claims and notices only to the MAC if:**

- A member was actively enrolled in hospice care prior to Jan. 1, 2022
- A member "opts out" of the MAO plan or moves into a non-participating plan. Note: The original plan will cover hospice and hospice-related services through the end of the month.

## **Hospice providers are to submit claims and notices to both the MAC and UnitedHealthcare if:**

- The current NOE became active on or after Jan. 1, 2022
- A member was actively enrolled in hospice before Jan. 1, 2022, revoked their hospice care and re-elected hospice on or after Jan. 1, 2022

# Notice submission requirements

Notices must be submitted to both the MAC and UnitedHealthcare within the time frames outlined below. Consistent with CMS requirements, if notices are not submitted in a timely manner, the hospice provider risks payment delays and/or reduction in payment.

## **Notice of Election**

Hospice providers must submit the Notice of Election (NOE) within 5 calendar days of hospice admission to both the MAC and United.

## **Notice of Termination or Revocation**

If a member chooses to revoke their hospice care election, the hospice provider must provide the MAC and UnitedHealthcare with a Notice of Termination or Revocation (NOTR) within 5 calendar days after the effective date of discharge or revocation.

A NOTR should **not** be used when a patient is transferred. Hospice providers must also contact the Envoy Care Team by phone to notify of discharge date and disposition within 24 hours of discharge. To do so, call 833-753-2970.

## **Notice of Transfer**

If a member chooses to transfer from one hospice agency to another, the hospice agency that the beneficiary is transferring from submits a final claim. After the transferring hospice has submitted their final claim, the admitting hospice then submits a hospice Notice of Transfer.

## Notifying Envoy Care Team of death

Please notify the Envoy Care Team by phone (833-753-2970) within 24 hours of member expiration.

# Billing and claims

## Methodology

Under the hospice VBID model, hospice providers will provide the services that CMS classifies as being covered in the hospice per diem payment. UnitedHealthcare will reimburse contracted health care professionals, according to CMS Standard Hospice Payment Methodology, based on the number of days and level of care provided during the member's hospice election period.

## How to submit claims

For members in the VBID demonstration plans (page 3) that elect hospice on or after Jan. 1, 2022, CMS requires health care professionals delivering hospice services to submit hospice care claims to both UnitedHealthcare and the MAC. Billing instructions can be found on the [CMS hospice VBID information site](#).

## When to expect payment

UnitedHealthcare is required to pay all clean claims within 30 days of receipt.

## Where to call with questions about claims

For any claims-related questions and/or inquiries, providers can contact the customer service number listed on the member's ID card.

## Billing for transitional concurrent care

Hospice providers should not bill for transitional concurrent care. The providers administering the transitional concurrent care services are to bill UnitedHealthcare, and UnitedHealthcare will reimburse these community health care professionals for eligible transitional concurrent care services.

## Additional resources for notices and claims

- [Medicare Claims Processing Manual; Chapter 25 – Completing and Processing the Form CMS-1450 Data Set](#)
- [Medicare Benefit Policy Manual, Chapter 9 – Coverage of Hospice Services Under Hospital Insurance](#)
- [Claims Processing Manual, Chapter 11 – Processing Hospice Claims](#)

# Appeals and grievances

Appeals and grievances regarding hospice care will be addressed using the existing appeals and grievances processes for UnitedHealthcare Medicare Advantage plans, except for immediate reviews of a termination of hospice service.

All appeals and grievances are to be submitted to the UnitedHealthcare Medicare Advantage plan by calling the customer service number listed on the back of the member's ID card.

Hospice appeals and grievances are considered time-sensitive and expedited.