



Place of Service (POS) 34 – Hospice

WPS Medicare recognizes that Current Procedural Terminology (CPT) codes for 2008 do not have specific codes for hospice care. Providers who are not employed by or under a financial arrangement with a hospice may need to bill for evaluation and management services for a hospice patient who is receiving respite care in a facility. Due to that fact, we would like to provide the following guidance for billing CPT codes and POS 34.

The WPS Medicare system recognizes POS 34 with three types of inpatient codes. The codes are inpatient CPT codes (99221 – 99239), nursing facility CPT codes (99304 – 99318), or inpatient consultation codes (99251-99255). WPS Medicare's system does not recognize other outpatient and observation CPT codes with POS 34.

A provider needs to determine the type of facility in order to determine the correct CPT code and POS 34 to submit. If the hospice is certified by Medicare and is part of a hospital or facility, then it may be appropriate to bill the inpatient hospital CPT codes in POS 34. If the hospice is a free-standing hospice, or located in a skilled nursing facility, or a domiciliary care facility the provider may want to bill the nursing facility codes in POS 34.

If the patient remains in the same hospital bed or unit and is discharged from the inpatient stay and admitted to hospice, it is correct to continue to bill POS 21 with inpatient CPT codes (99221 – 99239). POS 21 is where the patient remains, regardless of the status change to hospice.

If the patient is receiving hospice services in the home, the correct POS is 12 – Home, not POS 34. The Centers for Medicare & Medicaid Services (CMS) Internet Only Manual (IOM) 100-04, Chapter 26, Section 10.5 defines POS 34 as "A facility, other than a patient's home, in which palliative and supportive care for terminally ill patients and their families are provided." WPS Medicare does not accept CPT codes 99341 – 99350 when billed with POS 34 based on the definition in the IOM manual.

WPS Medicare's system does not recognize Domiciliary Care CPT codes 99324 – 99340 to be billable in POS 34, as the certification from Part A changes the bed from a domiciliary care bed to a hospice care bed. This type of certification from part A is for a free-standing hospice facility and should follow the guidelines for that type of a facility.