

CMS Two-Midnight Rules: Lessons Learned

Mike Todai

RN BSEE BBA

Hospital Case Management

Toll Free 1866 269 3612

Internal Audits: Main Opportunities

- Standardized admission form is not required but very helpful and recommended
- Closely review Observation cases changed to inpatient admissions
- Surgical cases and use Medicare inpatient only list
- H&P and dictated progress notes on chart **not** signed by the doctor before patient was discharged
- It is unrealistic for any Case Managers to expect physicians to remember all of the CMS requirements
- Obtain attending physician's signature to sign off orders and documentation before patient is discharged

CMS Compliance Requirements, 2-Midnight Rule & Inpatient Cases

Admission Order Matches with Billing
Inpatient Status (EHR and Billing System)

Physician Certification of Two Midnights

Medical necessity & supporting documentation
from physician in the chart requiring hospital
level of care

Orders, H&P / medical necessity documentation
are signed before patient is discharged

If early recovery before two midnights then
physician documentation clearly explaining it

Other Helpful Suggestions

- Rely on hospital supported internal resources first that are based on the latest CMS publication
- One of resource to cross reference to check Medicare Inpatient only List procedure:
http://hospitalcasemanagement.net/en/?page_id=32
- Please do not forget to use condition code 44 where appropriate or bill at lower level of care when internal audit does not justify inpatient status. Audit short stays before billing

Contact Information

Mike Todai
President and CEO



633 Chestnut Street, Suite 600 | Chattanooga, TN 37450
Cell 678 358 0004 | Work Phone & FAX 1 866 269 3612
mike@hospitalcasemanagement.net
www.hospitalcasemanagement.net