

INDEPENDENCE AT HOME DEMONSTRATION
Additional Frequently Asked Questions

1. Does Medicare need to be the primary payer for the eligible beneficiaries in the Independence at Home Demonstration?

Yes. Medicare must be the primary payer for all eligible beneficiaries in this demonstration.

2. Which Medicare billing codes do I use on a claim for home-based primary care?

Evaluation and Management (E&M) services provided in a patient's home under Medicare Part B, including CPT codes 99324 – 99328, 99334 – 99337, and 99341 – 99350, with the patient's home coded as the place of service would constitute home based primary medical care. If the patient's home is coded as the place of service, rural health clinics (RHCs) and federally qualified health centers (FQHCs) may use revenue codes 0522 and 0527 to indicate home-based primary care.

Beneficiaries may receive Medicare home health services, and any other Medicare-covered service, while receiving their primary medical care through an Independence at Home practice; however, a home health agency does not qualify as a home-based primary care provider unless it provides in-home medical care as a primary medical care provider. Medicare-covered home health benefits are not equivalent to primary medical care provided in the home.

3. Can critical access hospitals (CAHs), RHCs, and FQHCs apply to the Independence at Home Demonstration?

CAHs, RHCs, and FQHCs may apply for this demonstration if they are providing home-based primary care services, and meet all other criteria for eligible practices.

4. If my practice will be participating as a Pioneer Accountable Care Organization (ACO), can it apply to this demonstration as well?

Yes. Practices participating in the Pioneer ACO Model may apply for the Independence at Home Demonstration, but the subset of that practice representing the legal entity participating in the Independence at Home Demonstration cannot participate in both programs. This means that while a practice may participate in both the Pioneer ACO Model and the Independence at Home Demonstration, the individual practitioners in that practice, e.g., physicians, nurse practitioners, and physician assistants comprising the qualifying Independence at Home medical practice may not participate in both. That is, a practice may have the same Tax Identification Number (TIN) in the Pioneer ACO Model and Independence at Home Demonstration, but cannot have the same National Provider Identifiers (NPIs) in both programs. The practitioners represented by NPIs in the Pioneer Model may not participate in the Independence at Home Demonstration.

The solicitation states that “practices and their beneficiaries participating in the Demonstration cannot participate in any other program or demonstration that uses shared

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savings because savings related to a beneficiary with more than one organization cannot be determined without confounding the IAH model of care with the effects of other interventions or models.” There, “practices” refers to the legal entity participating in the Independence at Home Demonstration and does not apply to the larger medical practice.

5. If my practice is participating in the Shared Savings Program as an Accountable Care Organization (ACO) or is considering participation in the Shared Savings Program as an ACO, can I apply for this demonstration?

No. The statutory provisions governing both the Shared Savings Program and the Independence at Home Demonstration prohibit practices and providers from participating in these initiatives simultaneously.

Section 1866E(e)(2) provides that “The Secretary shall not pay an independence at home medical practice under this section that participates in section 1899”; and Section 1899(b)(4)(B) prohibits duplication in participation in shared savings programs by ACO participants and expressly identifies the Independence at Home medical practice pilot as another program that involves shared savings under Medicare.

Therefore, if your practice is already an ACO participant in the Shared Savings Program or you are applying for participation in the Shared Savings Program as an ACO participant, your practice may not also apply to participate in the Independence at Home Demonstration.