

PEPPER: A Valuable Data Resource for Hospices

What is PEPPER?

- The Program for Evaluating Payment Patterns Electronic Report (PEPPER) helps hospices identify where there is risk for improper Medicare payment (e.g., coding errors, inappropriate Part D medication claims).
- The annual report compares your hospice's data to peer organizations at the national, jurisdictional, and state level.
- PEPPER does not identify the presence of improper payments, but it is a guide for internal monitoring efforts to avoid adverse findings upon audit.

What metrics are in PEPPER?

- Your hospice's claims data from the last three federal fiscal years (e.g., October through September) are compared to others nationwide to determine if your organization is an outlier, defined as being in the 80th percentile or greater.
- There are 14 target areas evaluated, including three new pharmacy-related areas that help hospices ensure medications are billed to Medicare Part D appropriately per CMS pharmacy coverage rules.
- The three new targets are the average number of Medicare Part D claims for patients residing at (1) home, (2) in an assisted living facility or (3) a nursing facility.
- If PEPPER identifies your organization as an outlier for the three new target areas, this could indicate that medications for patients living at home or in a facility should have been paid for by the hospice, not Medicare Part D.

How can PEPPER help your hospice?

- If your hospice is an outlier for any target area, a sample of records can be reviewed to ensure that policies and procedures are in place to lead to appropriate coverage decisions consistent with CMS guidelines.
- Proactively acting upon PEPPER data could help your hospice avoid adverse findings upon future audits.
- PEPPER helps hospices maintain consistent quality policies resulting in positive clinical and financial outcomes.

How is PEPPER accessed?

- Your hospice's PEPPER is available to download at no cost through the [PEPPER Resources Portal](https://pepper.cbrpepper.org) (pepper.cbrpepper.org) in April each year.
- There are also multiple training tools available in the portal, including printed material and recorded webinars.
- PEPPER Help Desk can be reached at 1-800-771-4430 from 9 a.m. until 5 p.m. ET, Monday through Friday.

For more information and insights from Enclara, read our blog: [PEPPER Provides Early Warning of Audit Risk for Hospices.](#)

EPO42023