

Clinical Policy: Short Inpatient Hospital Stay

Reference Number: PA.CP.MP.182

Effective Date: 07/01/2021

Date of Last Revision: 10/23

Coding Implications

Revision Log

Description

Medical necessity criteria for day one and day two of an inpatient hospital stay, excluding behavioral health and obstetrical delivery admissions.

Observation care is a well-defined set of specific, clinically appropriate services, which include ongoing short term treatment, assessment, and reassessment before a decision can be made regarding whether patients will require further treatment as hospital inpatients or if they are able to be discharged from the hospital.³

Policy/Criteria

- I. It is the policy of PA Health & Wellness[®] (PHW) that day one and day two (if applicable) of an *inpatient hospital stay* (*vs. observation*) are **medically necessary** for one of the following indications:
 - A. Admission is for a procedure on the CMS 2023 Inpatient Only List for members/enrollees age 18 years and over (addendum E found [here](#)) or listed as a pediatric inpatient-only procedure in InterQual[®] for members/enrollees under 18 years of age;
 - B. Admission to an intermediate or intensive care unit level of care (including neonatal intensive care unit (NICU) is considered medically necessary per a nationally-recognized clinical decision support tool;
 - C. Admission to acute hospital care at home;⁷
 - D. Unexpected death during the admission;
 - E. Departure against medical advice from a medically necessary (per a nationally-recognized clinical decision support tool) inpatient stay;
 - F. Transferred from another facility, with a medically necessary (per a nationally-recognized clinical decision support tool) total length of stay greater than two days;
 - G. Election of hospice care in lieu of continued treatment in hospital.
- II. It is the policy of health plans affiliated with PHW that inpatient hospital stays on day three and beyond are **medically necessary** when supported by nationally-recognized clinical decision support tools.

Background

Expectation of time and the determination of the underlying need for medical care at the hospital are supported by complex medical factors such as history and comorbidities, the severity of signs and symptoms, current medical needs, and the risk (probability) of an adverse event occurring during the time period for which hospitalization is considered.¹

Observation services are commonly ordered for patients who present to the emergency department and who then require a significant period of treatment or monitoring in order to make a decision concerning their admission or discharge. The decision whether to discharge a patient from the hospital following resolution of the reason for the observation care, or to admit the

patient as an inpatient, can be made in less than two days and usually in less than 24 hours. In only rare and exceptional cases do reasonable and necessary outpatient observation services span more than two days.³

Centers for Medicare and Medicaid Services (CMS)- Inpatient Only List

The inpatient only list was established by CMS and identifies 1,700 procedures for which Medicare will pay only when performed in a hospital inpatient setting. Inpatient only services are generally, but not always, surgical services that require inpatient care because of the complexity of the procedure, the underlying physical condition of patients who require the service or the need for at least 24 hours of postoperative recovery time or monitoring before the patient can be safely discharged. There is no payment under the Outpatient Prospective Payment Systems (OPPS) for procedures that CMS designates to be “inpatient-only” services. The designation of services to be “inpatient-only” is open to public comment each year as part of the annual rulemaking process and many procedures have been added and removed over the years.⁶

Centers for Medicare and Medicaid Services (CMS)- Acute Hospital Care at Home

In November 2020, CMS announced the Acute Hospital Care at Home program to allow eligible hospitals expanded flexibility to care for patients in their homes. Hospital at home is designed to provide certain acute-level services in the home that patients would normally receive in the hospital setting. In-person physician evaluation is required prior to starting hospital at home care and patients may only be admitted from emergency departments and inpatient hospital beds. Acute Hospital Care at Home is for patients who require acute inpatient admission to a hospital and who require at least daily rounding by a physician and a medical team monitoring their care needs on an ongoing basis.^{7,8}

Coding Implications

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CPT® Codes	Description
N/A	

HCPCS Codes	Description
N/A	

Reviews, Revisions, and Approvals	Revision Date	Approval Date
Policy developed	02/20	03/20
Added to the description that “medical necessity criteria for day one and day two of an inpatient hospital stay, excluding behavioral health and obstetrical delivery admissions.” Clarified that the medical necessity statement in I. applies to the first and second days of an inpatient stay. Added section II., stating that days 3 and beyond are medically necessary per nationally-recognized clinical decision support tools. Replaced all instances of member with member/enrollee.	10/20	11/20
References reviewed and updated. I.A. was updated to specify “2020” Inpatient Only List. Background updated to include heading for CMS and information related to the Inpatient Only List and CY 2021 OPPS/ASC Final Rule.	02/21	03/21
New Policy to PHW	6/2021	
Annual review. In III, clarified that the statement refers to medically necessary stays supported by clinical decision support tools, vs. according to clinical decision support tools. Changed “Review Date” in the header to “Date of Last Revision,” and “Date” in the revision log header to “Revision Date.” Replaced 2020 inpatient only list with 2022 inpatient only list in I.A. and updated references accordingly. References reviewed and updated.	7/29/2022	
Annual review. Added I.C. “Acute hospital care at home.” Background updated with no clinical significance. Updated hyperlink to CMS inpatient only list in Criteria I.A. Added option in I.A. for procedure to be listed as an inpatient-only procedure in InterQual for those under 18 years of age, and noted that the CMS inpatient only list applies to those 18 years of age and older. Minor rewording with no clinical significance. References reviewed and updated. Internal specialist reviewed.	10/2023	

References

- Centers for Medicare & Medicaid Services (CMS). Reviewing Short Stay Hospital Claims for Patient Status: Admissions On or After January 1, 2016. (Last Updated: 12/31/2015). <https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/Medical-Review/Downloads/Reviewing-Short-Stay-Hospital-Claims-for-Patient-Status.pdf>. Accessed April 5, 2023.
- Centers for Medicare & Medicaid Services (CMS). Medicare Benefit Policy Manual. Chapter 1 - Inpatient Hospital Services Covered Under Part A. (Rev. 10892, 08/06/21). <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c01.pdf>. Accessed April 5, 2023.
- Centers for Medicare & Medicaid Services (CMS). Medicare Benefit Policy Manual, Chapter 6 - Hospital Services Covered Under Part B (Rev.10541 12/31/20). <https://www.cms.gov/regulations-and-guidance/guidance/manuals/downloads/bp102c06.pdf>. Accessed April 5, 2023.

4. Centers for Medicare & Medicaid Services (CMS). Inpatient Only List 2023. <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-opps-addenda.zip> Accessed April 5, 2023.
5. Centers for Medicare & Medicaid Services (CMS). CY 2023 Medicare Hospital Outpatient Prospective Payment System and Ambulatory Surgical Center Payment System Final Rule (CMS-1772-FC). Published November 1, 2022. <https://www.cms.gov/newsroom/factsheets/cy-2023-medicare-hospital-outpatient-prospective-payment-system-and-ambulatory-surgical-center-2> Accessed April 5, 2023.
6. Centers for Medicare & Medicaid Services (CMS). Inpatient-only services. Medicare First Coast Service Options, Inc. https://medicare.fcso.com/Billing_news/0483382.asp. Accessed April 5, 2023.
7. Centers for Medicare & Medicaid Services (CMS). CMS Manual System Pub 100-20 One-Time Notification. New Occurrence Span Code and Revenue Code for Acute Hospital Care at Home. Published January 20, 2022. <https://www.cms.gov/files/document/r11191otn.pdf>. Accessed April 5, 2023.
8. Hospital-at-home. American Hospital Association. <https://www.aha.org/hospitalathome>. Accessed April 5, 2023.