



Processing Claims Affected by Retroactive Entitlement

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Related Change Request (CR) Number: [CR 13402](#)

Implementation Date: January 24, 2024

Related CR Transmittal Number: R12306CP

Related CR Title: Processing Claims When the Dates of Services Are Beyond the Time Limit for the Patient Assessment

Affected Providers

- Home Health Agencies (HHAs)
- Inpatient Rehabilitation Facilities (IRFs)
- Other providers billing Medicare Administrative Contractors (MACs) for services they provide to Medicare patients

Action Needed

Make sure your billing staff knows:

- When certain claims are payable beyond the timely filing limit
- How to handle claims when you can't submit a patient assessment

Background

CR 13402 provides instructions to HHAs, IRFs, and MACs regarding situations when claims are payable but you can't submit the corresponding patient assessment. The CR contains no new policy.

A Medicare Program patient's entitlement date may sometimes be approved or changed retroactively. These cases can result in services becoming covered for dates of service beyond the Medicare timely filing limit. Since retroactive entitlement is an established exception to the timely filing period, you may submit these claims for payment per Section 70.7.2 of the [Medicare Claims Processing Manual, Chapter 1](#).

The Internet Quality Improvement Evaluation System (iQIES) accepts patient assessments up to 24 months from the assessment date. A retroactive entitlement decision may extend back beyond this 24-month period. When you can't submit patient assessments to iQIES because of the 24-month limit, CMS can't process the corresponding HHA or IRF claim without special intervention.

To process these claims

- IRFs should follow instructions in the updated Section 140.3.1.1 of the Medicare Claims Processing Manual, Chapter 3., which is part of [CR 13402](#)
- HHAs should follow instructions in the updated Section 10.1.9 of the Medicare Claims Processing Manual, Chapter 10., also a part of [CR 13402](#)

More Information

We issued CR 13402 to your MAC as the official instruction for this change.

For more information, [find your MAC's website](#).

Document History

Date of Change	Description
October 19, 2023	Initial article released.

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