RAC Audits Arrive at SLU

In an effort to address the continued concern that the Medicare Trust Funds may not be adequately protected against erroneous payment, the Centers for Medicare and Medicaid (CMS) have initiated a rigorous audit program. The Recovery Audit Contractor (RAC) program began as a demonstration project, recouping $980 million from three states. Effectiveness of the demonstration project in identifying and correcting improper Medicare payments and identifying high risk vulnerabilities such as insufficient documentation to support medical necessity and non-compliance with timely response to medical record submission, led to the National RAC Program implementation on January 1, 2010.

Unlike previous monitoring and review efforts, the RAC Program utilizes contract organizations to identify, analyze and audit overpayments and underpayments. Health Data Insights, Inc. (HDI) is the contractor responsible for Region D audits, which includes the State of Missouri. The contracted company (HDI) is paid based on recovered improper payment amounts.

HDI notifies SLUCare of overpayments and underpayments by issuing a demand letter. The letter outlines a multi-step complex appeal process which must be followed to prevent repayment with interest.

A copy of the RAC Demand letterhead is attached to this electronic news format.

Anyone who receives a letter with this letterhead should immediately forward it to Sue Schuler at PMO/Fax 977-6790 or by email, schulers@slu.edu.

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Demand Letter

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Billing Compliance

**CMSConsults Update**: The Center for Medicare and Medicaid Services announced, effective January 1, 2010, all consultation codes (CPT 99241-99245/outpatient consult codes and 99251-99255/inpatient consult codes) are no longer recognized for Medicare Part B payment. Providers are instructed to code appropriate Evaluation & Management (E & M) codes that report where the visit occurs and the complexity of the service performed.

**Q & A**

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<tr>
<th>Q.1. May I continue to document, code and bill consults to non-Medicare payers?</th>
<th>Q.2. What if I do not know or am not sure if a patient has Medicare?</th>
<th>Q.3. What codes may be utilized when a consult code may not be billed?</th>
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<tr>
<td>A.1. Yes. At this time there has been no written directive prohibiting consult billing.</td>
<td>A.2. The SLUCare Practice Management Organization (PMO) has implemented edits in the billing system to check payer status and alert billing staff when consult codes are entered for Medicare payors. The billing staff will then check the documentation and re-code appropriately or will request that the provider resubmit the appropriate category/level of service.</td>
<td>A.3. In the office setting, CPT codes for either New Patient (99201-99205) or Established Patient (99211-99215) may be used.</td>
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<th>Q.4 How do I bill an initial hospital visit instead of a consult when the admitting service has already billed an initial hospital visit?</th>
<th>Q.5 Are there differences in documentation and coding guidelines for consult versus initial hospital visits?</th>
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<td>A.4. The admitting physician or principal physician of record will append modifier &quot;-A1&quot;, Principal Physician of Record.</td>
<td>A.5. Yes, the documentation for initial hospital visits is more stringent. CPT codes 99221 (Initial Hospital Visit) and 99218 (Initial Observation Care) require a detailed history and detailed exam for the lowest level. A level one consult requires only a problem-focused history and exam.</td>
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<th>Q.6 How do I bill for a consult service in the Emergency Department?</th>
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<td>A.6. If the Emergency Department physician requests that another physician evaluate a given patient, the other physician should bill an emergency department code. If the patient is admitted to the hospital by the second physician performing the evaluation, he/she should bill an initial hospital care code and not an emergency department visit code.</td>
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General Resources

**General HIPAA Awareness Training:**
Thursday, September 23, 2010
3:00 pm – 4:00 pm
LRC Room 110

**SLU HIPAA Website:**
www.slu.edu/hipaa/

**Billers Meeting:**
Tuesday, September 21, 2010
10:00 am – 11:00 am
Medical School Lecture Hall 1

Tuesday, November 23, 2010
10:00 am – 11:00 am
LRC Rooms 110-111

**Center for Medicare & Medicaid Services:**
www.cms.hhs.gov

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**Office of University Compliance**
Caroline Building
Room C130
3545 Vista Ave
St. Louis, MO 63104

**Contact Us:**

**Compliance Dept**
977-5545
Kathleen Merlo
Director
merlokb@slu.edu
Ron Rawson
Privacy Officer
rawsonrr@slu.edu
Sally Frese
Assistant Director
freesem@slu.edu
Lynn Monahan
Compliance Coordinator
monahani@slu.edu
Karen George
Auditor
gerogeckm@slu.edu
David Vence
Auditor
dvence@slu.edu
Kerry Borawski
Research Auditor
borawsk@slu.edu
Michael Reeves
Research Auditor
mreeves8@slu.edu
Theresa Brewer
Adm. Assistant
bprewer3@slu.edu
Heather Muniz
Adm. Secretary
hmuniz1@slu.edu