



What's up Doc? case management news

“10” Lessons from the RAC Demonstration Program

Key advice from providers who survived the RAC, Medicare's Recovery Audit Contractors demonstration project.

- 1) Track and monitor ALL correspondence to and from the RAC. Going beyond dates you send or receive documents but also tracking receipts to ensure timely responding. The time lines are CRITICAL.
- 2) Tracking appeals is the single most important way to survive a RAC audit because it allows you time to prioritize the appeal.
- 3) Having a strong **physician advisor** participant reviewing and interceding when appropriate. Having such an advisor strengthens the compliance program which is more defensible when appealing cases, especially once they reach the Administrative Law Judge.
- 4) Hospitals have to get Medicare patient's status correct EVERY TIME. *Make sure case managers are using criteria to review all Medicare admissions* and that every case that does not
- 4) meet the criteria is undergoing a second-level review by a physician advisor.
- 5) Remember that RAC contractors are authorized to refer cases for investigation to the OIG when fraud or abuse is suspected.
- 6) Take advantage of the 15-day rebuttal period prior to the actual appeals process. Even if only 10% of the cases were spared from this process, it was worth pursuing.
- 7) Communication between the RAC and providers was not optimal. Recommendations were made to follow up voice mail messages with official letters if phone calls are not returned within the allotted time.
- 8) Physician Education. *Many physicians do not have a firm understanding of regulatory guidance on inpatient versus observation status certification and, more importantly, the ramifications of getting the status wrong.*

It is your hospital's responsibility to educate your physicians on the importance of documenting all of their concerns and findings in order to demonstrate “*medical necessity*” for all inpatient admissions. Strong collaboration between treating physicians, case management and physician advisors as they work to correctly certify each Medicare admission, ensuring compliance with the law.

- 9) Case Management is extremely important in the process.
- 10) Scan all documents to and from the RAC (including medical records). As you move through the process, having documents stored electronically will ease the appeals process.



PHYSICIAN REMINDERS:

The Medicare Recovery Audit Contractor demonstration project has come and gone, however the 10 lessons learned (listed above) will prove to be invaluable when the Medicare RAC Audits begin in Louisiana in the near future.

Help us keep our dollars in our pocket!

• *Questions? Contact Debbie Picou, RN 873-1833*