

## Eli's Hospice Insider

### Audits: Hospices In Region C Court Most RAC Scrutiny

**Don't be surprised if providers come looking to you for bundled payments.**

Recovery Audit Contractors continue to crank up their review of hospice claims, so smart agencies will beef up their documentation accordingly.

**For example:** Region C RAC **Connolly Inc.** approved a new hospice issue in February. "Providers are billing with Core-Based Statistical Area (CBSA) codes that are invalid or no longer in use," Connolly says of the CBSA issue on its website. The RAC approved the same topic for home health agencies in December.

Connolly has more hospice and home health issues approved by the **Centers for Medicare & Medicaid Services** than any other RAC, going from one approved topic to seven in the last 15 months. In addition to home health topics ranging from validation of late episode timing to OASIS not completed, Connolly is hunting down payments for items or services that should have been bundled into hospice payments. It has that topic approved in the home health, inpatient hospital, outpatient hospital, physician, and durable medical equipment settings.

Other RACs aren't just ignoring home health and hospice, however. Region A RAC **Performant Recovery** and Region B RAC **CGI Federal Inc.** both received CMS approval last October for "Skilled Nurse Length of Stay" and "No Skilled Service" topics.

With home health topics under their belts, Performant and CGI may come gunning for hospice topics next, observers predict.

Region D RAC **HealthDataInsights Inc.** researches hospice issues only for payments to hospitals and DME suppliers that the hospice should have covered. Likewise, its only home health-related topic is aimed at DME suppliers who were paid for supplies that should have been covered under the home health prospective payment system.

Region A RAC Performant, formerly **DCS**, tested a few home health topics last year that don't seem to have made it onto the CMS-approved list. DCS investigated high therapy episodes and high recertifications.

All four RACs list their approved issues on their websites.