

How to Appeal with Weak Documentation

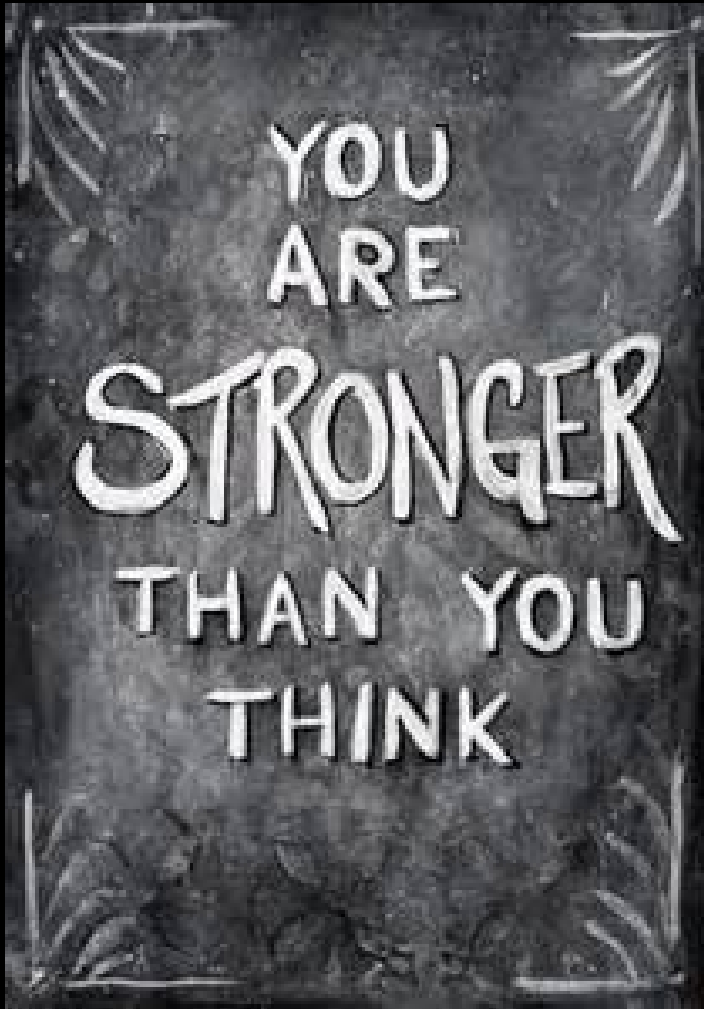


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Making the Weak Strong



Denial really strong?

Is it factual?

Violate policy?

Correct Surgery code?

Correct LCD ?

Documentation really weak?

EMS/ED/Consults/ASA class

Risk scores/Physician addenda

EBM/Position papers

MAC P&E: 1 MN stays

The Swift Rule of Denials



**"NEVER BELIEVE ANYONE WHO TELLS
YOU THAT YOU DON'T DESERVE
WHAT YOU WANT." – TAYLOR SWIFT**

Is it a Factual?



How Auditors Misspeak:

Minimize

Misrepresent

Misstate

Is the Denial Truthful?



“The Chest CT findings showed no new changes”



“Laboratory studies were unremarkable”



“Examination of the abdomen was within normal limits”

Does the Denial Violate Policy?



Two Critical Policies

- Admission is a prospective decision
- Are there extenuating circumstances

Admission is Prospective



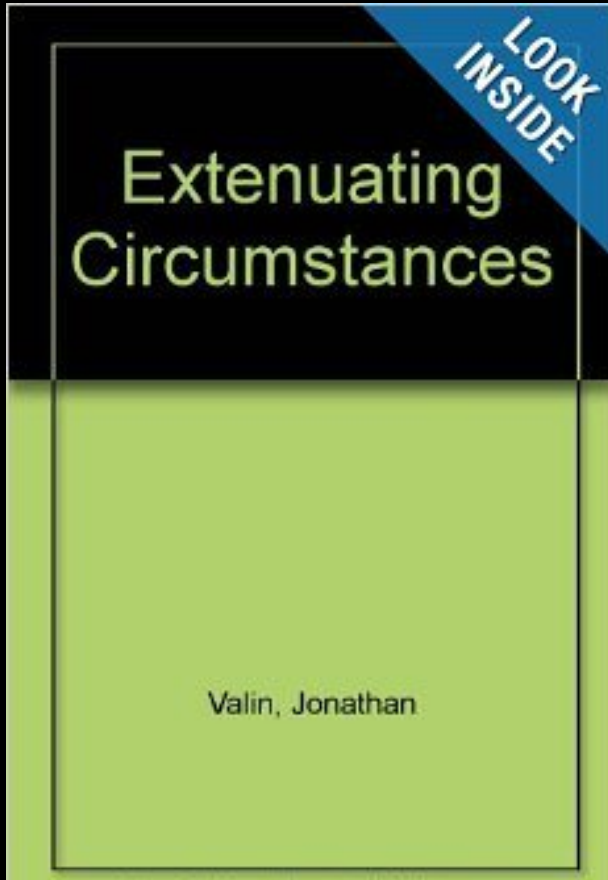
“In making judgments QIOs consider only the medical evidence which was available to the physician at the time an admission decision had to be made.”

Denials: Retrospective & Revisionist History



**Misapplication of Medicare policy
by citing post-admission data**

Extenuating Circumstances?



**“The reviewer shall consider...
any pre-existing medical problem or
extenuating circumstances
that make admission of the
beneficiary medically necessary”**

CMS Program Integrity Manual 100-08; C. 6; Section 6.5.2

Extenuating Circumstances



Psychiatric disease

Centenarianism

Christmas (Denise Wilson)

CPT Code: Inpatient or Outpatient Surgery?



A Tale of Two Codes

**TODAY I WILL
WORK ON MY
WEAKNESSES**

Billed as 45130 – Excision of a Rectal Prolapse

Denied as 45135 – Excision of a Rectal Prolapse

But...both are IPO codes!

Reimbursement \$\$\$ 45135 > 45130

Check the LCD Date

LCD for Surgery: Blepharoplasty (L32715)

Date	Revision History Number
3/27/2014	R4
3/27/2014	R3
11/19/2012	R2
11/19/2012	1R

Supporting Evidence: Medical Necessity



Review Articles

EBM/Position Papers

Risk Scores: CURBS, TIMI, ABCD²

EMS,ER Note & Consults

Previous Hospitalizations

Office Records

Supporting Evidence: Procedures



Inpatient Only List
NCDs & LCDs
Specialty Guidelines
Outpatient Recs –MD/PT
Physician addenda

MAC Checkups: P&E



1 MN = 1 INPT MN or 1 OBS MN + 1 INPT MN

Certification Checkups



Documented need & time of services

Signed admission order

Signed H&P

Discharge plan

Signed Certification form

Getting Good Checkups



All 1 MN INPTS

-“unexpected recovery”

-Ventilator patients

-AMA/Death/Transfer

All 1 OBS MN + 1 INPT MN

**-Ongoing hospital services
required for another MN**

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Thank You



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