

Short Stay Review Updates

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Short Stay Reviews - Update

- **BFCC-QIOs received a “stop work” order from CMS on May 4, 2016**
 - Done to ensure consistency between contractors
 - Re-education on CMS policy directions were completed
 - Cases that were still “in process” were removed from provider samples and made payable under Part A
 - Cases that had “formal denials” were re-reviewed with outcome determinations sent to providers
- **BFCC-QIOs received instructions to resume processing Short Stay reviews on September 12, 2016**

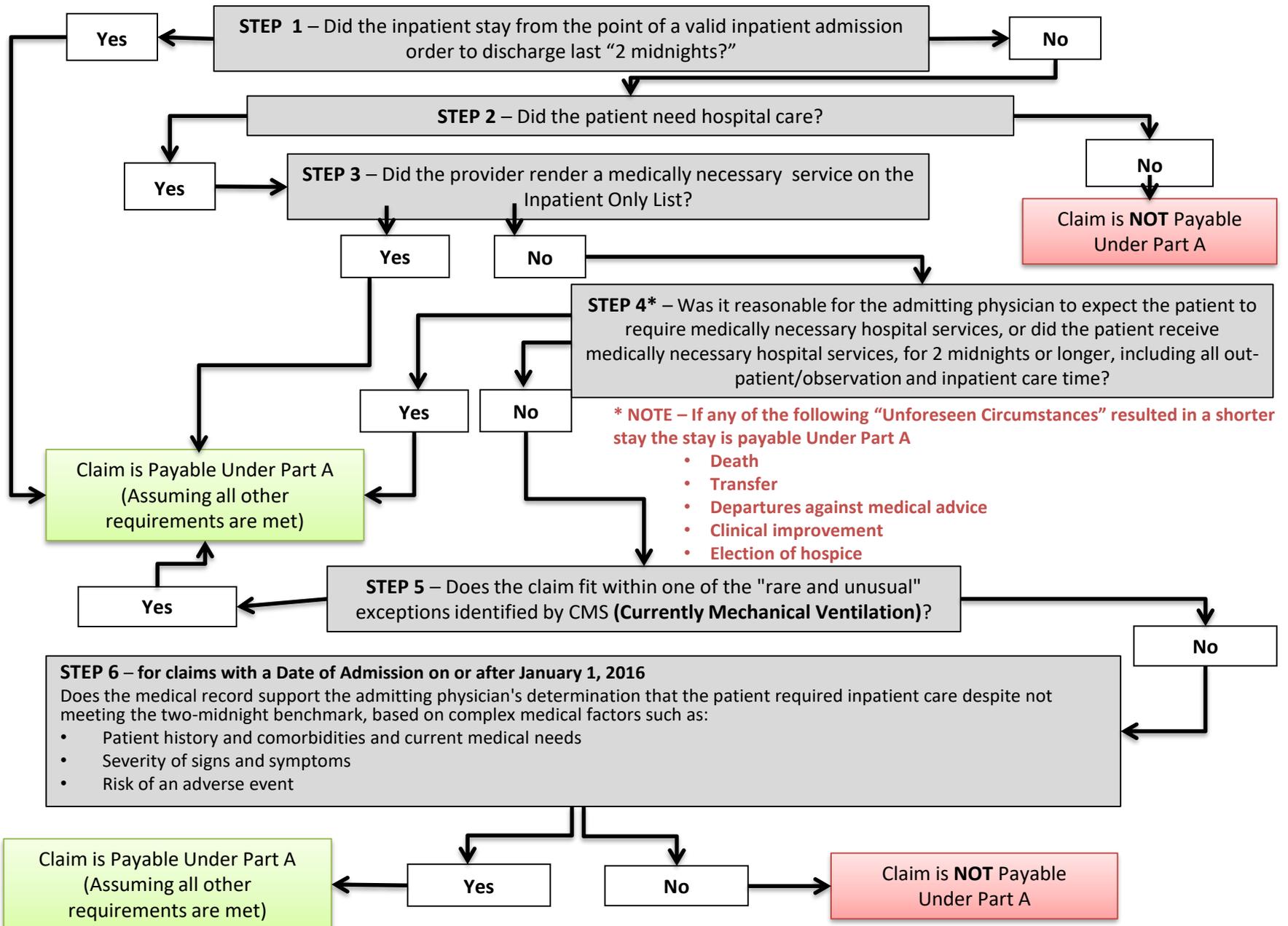
Short Stay Reviews - Update

- **Claim selection process relatively unchanged**
 - CMS did add the limitation on dates of service eligibility
 - CMS provides monthly total adjudicated Short Stay claims from which BFCC-QIOs draw samples
 - Parameters such as specific disposition codes, length of stay, and procedures have been included in the selection criteria in order to eliminate them from the universe

Short Stay Reviews - Update

- **BFCC-QIOs will request medical records:**
 - Providers have up to 45 days to submit medical records
 - Reminders to be sent at day 15
 - Reminders will also be provided during educational sessions
- **Medical records accepted via CMS-approved methods:**
 - esMD; encrypted CD; fax transmission – dedicated number established (844-242-2568); and hard copy

BFCC-QIO TWO-MIDNIGHT CLAIM REVIEW GUIDELINE



Short Stay Reviews - Update

- **BFCC-QIO will review the medical record to assess hospital compliance with:**
 - Admission order requirements
 - Two-Midnight benchmark
 - Reasonableness of inpatient admissions based on the information known to the physician at the time of admission

Short Stay Reviews - Update

- **Admission order requirements:**
 - Inpatient admission order continues to be required for all admissions
 - Requirements found at: www.tiny.cc/AdmissionOrder
 - Must specify admission for inpatient services
 - Must be furnished by physician/other practitioner who is licensed by state to admit patient; granted hospital privileges to admit; and knowledgeable about patient's hospital course, medical plan of care, and current condition at time of admission

Short Stay Reviews - Update

- **Two-Midnight benchmark, where expected length of stay is less than two midnights:**
 - Unless admission involves services listed on the Inpatient Only List, Part A payment isn't generally appropriate for lengths of stay of less than two midnights
 - Under revised policy, admissions less than two midnights may be appropriate on a case-by-case basis where the medical record supports the physician's decision that patient requires inpatient care
 - BFCC-QIOs will consider: complex medical factors, severity of signs/symptoms, current medical needs, risk of adverse event to determine if medical record supports inpatient admission

Short Stay Reviews - Update

- **Two-Midnight benchmark – expectation of a two or more midnight length of stay upon hospital entrance for:**
 - Surgical procedure(s)
 - Diagnostic testing
 - Other treatment
- **Is generally appropriate for inpatient payment under Medicare Part A, when the orders admission based on the expectation of (medically reasonable) hospital services to span two or more midnights**

Short Stay Reviews - Update

- **If unforeseen circumstances result in a stay less than two midnights, hospital payment may still be appropriate**
 - When patients are entering the hospital for procedures, testing, or other treatment and the physician expects hospital services to span two or more midnights and orders admission
 - Additional examples of such circumstances include but may not be limited to: patient death, transfer to another hospital, leaving against medical advice (AMA), clinical improvement, electing hospice care in lieu of continued hospital treatment

Short Stay Reviews - Update

- **Two-Midnight benchmark, where length of stay is expected to be greater than two midnights:**
 - Two-Midnight benchmark is based upon the physician's expectation of the required duration of medically necessary hospital services at the time the inpatient order is written and formal admission begins
 - Decision to keep beneficiary in the hospital and expectation of needed duration of care are based on complex medical factors – BFCC-QIO will consider such complex factors in making their determinations
 - Physicians need not include attestation of expected length of stay; this information may be inferred from medical documentation

Short Stay Reviews - Update

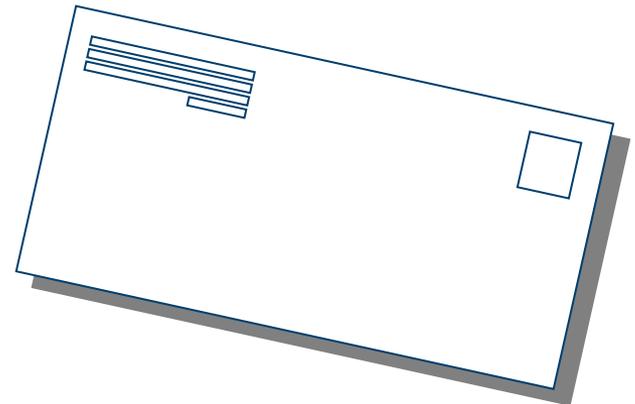
- **Reasonableness of inpatient admission:**
 - BFCC-QIOs will continue to follow guidance to review medical reasonableness of inpatient admission
 - Based upon the knowledge the physician had at the time inpatient admission was written
 - “Supported by evidence of medical necessity and quality in such form and fashion and at such time as may reasonably be required by a reviewing QIO in exercising its duties and responsibilities...”

Short Stay Reviews - Update

- **Reasonableness of inpatient admission:**
 - BFCC-QIOs will continue to follow CMS guidance that payment is prohibited for:
 - Care rendered for social purposes
 - Care rendered for convenience
 - Extensive delays in providing medically necessary care
 - Without accompanying medical conditions, factors that cause inconvenience in terms of time and money do not justify Part A payment for continued hospital stay

Short Stay Reviews - Update

- **BFCC-QIO mails results letter**
 - One letter per provider with results for all claims
 - Provide clinical rationale for all decisions made
 - Will be used as basis for open dialogue with providers during 1:1 educational sessions
 - Will inform providers of possible Technical Denials for all records not received



Short Stay Reviews - Update

- **Results stratification**
 - Minor Concern:
 - Provider with an error rate of $\leq 10\%$ and no pattern of errors
 - Moderate Concern:
 - Provider with an error rate of $> 10\%$ but $\leq 20\%$
 - Major Concern:
 - Provider with an error rate of $> 20\%$

Short Stay Reviews - Update

- **Provider education**
 - BFCC-QIO conducts provider outreach and education within 90 days of review completion
 - Dedicated nurse educators foster relationship building
 - Offers opportunity for hospitals to provide additional information which may be used by the BFCC-QIO for final determination
 - Opportunity to remind providers to submit records not previously submitted
 - CMS may participate in educational sessions
 - Schedule educational sessions online at:
<https://keproteleconference.appointy.com/>

Short Stay Reviews - Update

- **Final results**

- BFCC-QIO will send a final results letter to providers
 - Reflects the status of all claims after the educational session
 - Provides information on next level of appeal if applicable



Short Stay Reviews - Update

- **Next steps:**
 - BFCC-QIO forwards all non-compliant claims and/or missing medical records denials to the Medicare Administrative Contractor (MAC)
 - MAC has responsibility for making financial adjustments
 - Providers can appeal through the MAC
 - BFCC-QIO will refer non-compliant providers to Recovery Auditors (RA) as directed by CMS
 - Upload all reviewed claims into the RA data warehouse; suppresses claims from further review by RAs

Short Stay Reviews - Update

- www.keproqio.com/twomidnight
- Updates and information
- CMS resources
- FAQs
- Form to update your organization's contact information

The screenshot shows the KEPRO website interface. At the top, there is a navigation bar with links for Home, Beneficiary Helpline, Careers, About Us, and Contact Us. Below the navigation bar is a search box and a 'Sign up for our Newsletter' button. The main content area features a header with the Quality Improvement Organizations logo and the KEPRO logo. A large image shows an elderly couple looking at a laptop. To the right of the image is the heading 'Short Stay Reviews' and a brief introduction: 'We are the Medicare Quality Improvement Organization, working to improve the quality of care for Medicare beneficiaries. Our site offers beneficiary and family-centered care information for providers, patients, and families. Welcome!' Below this is an 'Update' section with text about CMS changes to the selection process for medical records for Short Stay reviews. A 'Schedule Today!' button is located in a blue box on the right side of the update section. At the bottom of the page, there is additional text about CMS changes to its approach with regard to educating providers and enforcing the Two-Midnight Rule, and a list of key elements that providers need to know, including links to a Fact Sheet, CMS-1633-FC, and a 2016 CMS Inpatient Only Procedure List.

Questions



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