"10 Critical Actions to Minimize RAC Recoupment"

National Medicare RAC Summit

Washington, DC

March 6, 2009

Presenters

Stephen Forney, MBA, CPA, FACHE, FHFMA **VP - Margin** Development Ardent Health Services Nashville, TN 615-296-3054 stephen.forney@ ardenthealth.com

Bill Phillips, FACMC, CHC **Associate Professor** Health Svcs Mgt & Ldrshp Geo Washington Univ. / VP & Chief Revenue Off **Revenue Strategies** 786-371-6493 billinfll@juno.com

Outline

A. How to Minimize RAC Recoupment

B. RAC - Newest ATM

C. Take Home...

A. How to Minimize Recoupment



10 Critical Actions

- 1. RAC is not FI
- 2. Appoint Chief RAC Officer
- 3. Prepare, prepare, prepare (7 steps)
- 4. Conduct pre-RAC Audits
- 5. Implement RAC Record Request Tracking

10 Critical Actions

- 6. Establish clinical & coding feedback
- 7. Calculate impact of overpayments
- 8. Start Yesterday
- 9. Appeal, appeal, appeal
- 10.Re-bill all IP denials as OP

#3. Prepare, Prepare, Prepare

Seven Steps

- 1. Identify all cases at risk
- 2. Prioritize by recoupment impact
- 3. Perform coding & medical necessity reviews
- 4. Establish RAC repository
- 5. Test RAC work flow
- 6. Prepare Recoupment Reports
- 7. Apply RAC up-dates (new targets, etc.)

4. Conduct pre-RAC audits

Service	Volume	Recoup / Claim
Cardiac Defibrillator	2,200	\$ 29,500
Surgical Procedures	5,400	\$ 16,500
Respiratory w/ Ventilator	2,100	\$ 15,400
Excisional Debridement	6,100	\$ 10,000
Heart failure & Shock	6,100	\$ 5,400
Average Recoupment		\$ 15,320

B. RAC – Newest ATM



RAC Recoupment

ATM # 1: Automated

- Electronic claim review
 - Duplicate claims
 - Same patient
 - Same date of service
 - Duplicate payment
 - RAC withdrawal

ATM # 2: Complex

- Manual review
 - Suspected error
 - Medical record needed
 - 45 days to reply
 - Site of service issue
 - Proper documentation
 - 1/3 are overpayments

Automated vs. Complex

	AUTOMATED	COMPLEX
TIMING	Early	Later
Medical Record	No	Yes
Appealable	No	Yes
RAC Accuracy	HIGH	LOW
Recoupment	\$ 8,000	\$ 8.400
Recoupment	LOW	HIGH
Hospital Effort	LOW	HIGH

C. Take Home



#1: RAC – aka "Margin Eraser"



2009 Margin

CY 2009	In millions	
GPSR	\$ 1,220	
Margin	\$ 4.0	
Percent	0.3 %	

Unprepared - 2010 Margin

CY 2010	After RAC
GPSR	\$ 1,220
RAC Recoupment	\$ 3.0
New Margin	\$ 1.0
Net Change	(\$ 3.0)
Erased Margin	\$ 3.0

Prepared - 2010 Margin

CY 2010	After RAC	
GPSR	\$ 1,220	
RAC Recoupment	\$ 1.0	
Margin	\$ 3.0	
Net Change	(\$ 1.0)	
Erased Margin	\$ 1.0	

2: Start yesterday...

Review - Oct 1, 2007 – Apr 1, 2011

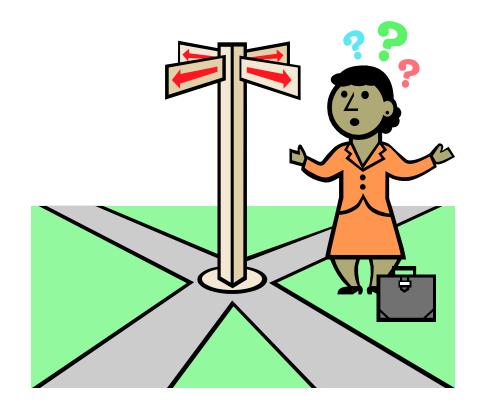
- Reviewable Now Oct 1, 2007 Mar 6, 2009
 - 18 months

- Reviewable Later Mar 6, 2009 Apr 1, 2011
 - 24 months or more...

#3: Prepare, Prepare, Prepare



4: Appeal, Appeal, Appeal



If not...



References

- "RAC Demo Report", CMS, Mar 2008
- "RAC Demo Update", CMS, Sep 2008
- "10 Critical Actions to Minimize RAC Recoupment", Forney & Phillips, HLF, 2009
- "RAC Update", IMA Consulting Newsletter, Jan 2009.

Contact Info...

Stephen Forney, MBA, CPA, FACHE, FHFMA **VP - Margin** Development Ardent Health Services Nashville, TN 615-296-3054 stephen.forney@ ardenthealth.com

Bill Phillips, FACMC, CHC **Associate Professor** Health Services Mgt. Geo Washington Univ. & VP & Chief Revenue Off **Revenue Strategies** 786-371-6493 billinfll@juno.com