

# 2 Midnights - Viewpoint from the MAC

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# Novitas Jurisdictions



- JH consists of Colorado, New Mexico, Oklahoma, Texas, Arkansas, Louisiana, Mississippi
- JL consists of Pennsylvania, New Jersey, Maryland, Delaware, District of Columbia
- Together our jurisdictions comprise approximately 24% of the Part A/Part B Medicare claim volume

# Probe and Educate Medical Reviews – First Round



	# Providers	# Claims Reviewed	# Claims Denied	% Claims Denied
JH	1004	3794	2206	58%
JL	586	2712	1720	63%

# Probe and Educate Medical Reviews – Second Round\*



	# Claims Reviewed	# Claims Denied	% Claims Denied
JH	3028	1666	55%
JL	1501	901	60%

\* To date

# Top Reasons for Denial – First Round



Denial Reason	% Denials JH	% Denials JL
Documentation did not support two midnight expectation (did not support physician certification of inpatient order)	50%	51%
No Records Received	29%	28%
Documentation did not support unforeseen circumstances interrupting stay	11%	11%
No inpatient admission order	3%	3%
Admission order not validated/signed	4%	3%
Other	3%	4%

# Top Reasons for Denial – Second Round



Denial Reason	% Denials JH	% Denials JL
Documentation did not support two midnight expectation (did not support physician certification of inpatient order)	56%	53%
No Records Received	16%	17%
Documentation did not support unforeseen circumstances interrupting stay	4%	3%
No inpatient admission order	9%	15%
Admission order not validated/signed	11%	11%
Other	4%	1%

# Problematic Clinical Situations



- Inadequate historical detail to understand symptoms of unknown significance in patients with underlying diseases
- Unstated or unclear impressions and treatment plans
- Admissions for management based on clinical guidelines and algorithms then not following those guidelines
- Variations in descriptions of patient condition by different physicians without explanation or reason
- Disconnects (and disagreements) between admitting physician and attending physician and between attending physician and specialist physicians
- Unforeseen circumstance vs. incorrect admitting diagnosis and treatment plan

# Examples



- Transient Cerebral Ischemia
- Vague neurologic changes, altered mentation, uncomplicated syncope
- Gastrointestinal bleeding
- Cardiac arrhythmias (atrial fibrillation)
- Tube replacements
- Volume depletion
- Same day outpatient procedures
- Psychiatric problems, suicidal ideation, patient non-compliance, alcohol inebriation



# What's Missing?



- Solid documentation of the nature of an illness, the physician's impression (differential diagnoses), and a clear statement of diagnostic/therapeutic choices along with their stated or implied rationale

# ALJ Process Participation



- **Selective approach to participation**
  - Prior to 2014 participating in 1-2% of available cases
  - Now participating in 15-20% of available cases
  - Majority of available cases are Part A
- **2014 statistics demonstrate effectiveness of our participation**
  - Confirmation of denial in 80 % of cases in which we participated
  - Confirmation of denial in 40% of cases in which we did not participate

Questions?