



The

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Medicare Audits: "Picking Apart your Home Health Agency" by a Medicare Administrative Contractor (MAC) and Zone Program Integrity Contractor (ZPIC)

by Colin Elliot, PT, OCS, CertMDT, Bud Langham, PT, MBA, and Ken Miller, PT, DPT

WHAT AGENCIES ARE EXPERIENCING

This article is a follow up to an article printed in the Fall 2010 issue of *The Quarterly Report* entitled, "Alphabet Soup: Medical Necessity Review and Medicare Recovery Audits." Since the original article was published, the authors have each personally experienced the Medicare audit process. The purpose of this article is to discuss the audit process a certified home health agency undergoes from a Medicare administrative contractor (MAC) and from Zone Program Integrity Contractor Audits (ZPIC).

As of the writing of this article, the Zone Program Integrity Contractor (ZPIC) for zone six (Pennsylvania, New York, Maryland, Washington D.C., Delaware, Maine, Massachusetts, New Jersey, Connecticut, Rhode Island, New Hampshire, and Vermont) has not been awarded. The ZPIC for zone five (Alabama, Arkansas, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Virginia and West Virginia) has been awarded to AdvanceMed Corporation but is under dispute. My colleagues both work in zone four and have undergone ZPIC audits, which will be discussed shortly. The zone four ZPIC is Health Integrity, LLC, covering Colorado, New Mexico, Oklahoma, and Texas.

One of the many dreaded acronyms that send shivers up the spines of administrators is "ADR". (A more ominous acronym is "ZPIC" which will be discussed later.) These three letters mean Additional Development Request or Additional Document Request. ADRs are sent to Medicare providers including home health agencies in the event the Medicare Administrative Contractor (MAC) is unable to make a claim determination. The inability to make a determination places the bill, which may have been paid, into a "suspension" category until a determination has been made.

National Government Services is the Medicare Administrative Contractor who processes Medicare claims in New York State. Several months ago they notified a certified home health agency (CHHA) that they were going to have a focused audit based on "aberrancy" of utilization of therapy services comparing the 4th quarter of 2009 and 4th quarter of 2008. More recently, ADR documents started to arrive at the home health agency. The ADR stated that a claim determination required additional information and recommended what information the agency should provide with the supporting documentation. See Table 1, National Government Services ADR statement.



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Online Member Benefit: Discussion Forums

The Home Health Section is pleased to introduce a new online benefit to Section members: Discussion Forums. The Forums focus on specific topic areas and provide members with an easy way to post questions for response from volunteer experts and, unlike the Section listserv, provide more easily searched archives.

Like the listserv, members may adjust Forum subscription settings to allow for email notification, and may subscribe or unsubscribe to the Forum as convenient.

Currently, the Section's Discussion Forums feature two topics:

- Coding for Physical Therapy in the Home Health Setting
- Regulatory Affairs in Home Health

General Instructions for Using the Forums

Login to the Section website to access the Forums. You'll find links for the "Discussion Forums" page in the Tools & Resources drop-down menu or the Member Services drop-down menu.

Click the ? under the introduction on the Forums page for help using the Forums.

Enter an individual Forum by clicking on the topic link. From this next page, you can search this particular Forum, set up your own subscription preferences (as well as add an automatic signature to your postings), and add a discussion item.

Allow our volunteer experts to respond to your Forum posting(s) in about three business days (but you'll often receive a response sooner).

www.homehealthsection.org/forum.cfm

The Quarterly Report welcomes your letters and e-mails. We will consider for publication letters that relate to specific articles in the publication and letters of general interest to the physical therapy profession. Letters may be edited for clarity, style, and space.

Send letters to the Home Health Section, PO Box 4553, Missoula, MT 598906-4553; fax 866-861-4675; e-mail admin@homehealthsection.org. In all correspondence, please include your full name, credentials (if applicable), city, and state.

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Dedicated to the profession and community, the HHS Career Center is a valuable search and recruitment resource for physical therapists and employers in the home health sector. The HHS Career Center offers simple and easy-to-use tools to make searching for career opportunities and finding qualified professionals fast, efficient and successful.

Tools for Job Seekers

The HHS Career Center gives job seekers access to inside opportunities available only through the association and provides the tools needed to quickly find and apply for jobs.

Advanced Job Search

Find the most relevant home health physical therapy jobs from top employers.

Customized Job Alerts

Stay up-to-date on the latest opportunities by receiving automated notifications.

Apply for Jobs

Create an anonymous profile and resume to quickly apply for jobs and have employers come to you.

Advantages for Employers

Employers can fill positions faster and at a lower cost than other job websites by reaching a highly qualified and targeted audience of physical therapists in the home health sector.

Recruit Top Talent

Target HHS members and job seekers committed to the advancement of home health physical therapy.

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Reduce recruitment costs with flexible, affordable posting options.

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New Audio Presentations Available Online

Free Podcasts Offer PPS 2011 Clarifications

In an effort to address numerous questions and much misinformation related to the final Prospective Payment System (PPS) rule issued by the Centers for Medicare & Medicaid Services (CMS) this past fall, the Home Health Section produced two short podcasts on G-Codes & Therapy Maintenance and Reassessment Issues (13th & 19th Visits) in February.

Section President Cindy Krafft, PT, MS, COS-C is the presenter for these two clear and to-the-point podcasts. Each podcast is 15-20 minutes and available in an mp3 file for online streaming or download. You'll find a link for the Free Podcasts on the Home Health Section homepage or on the "Regulatory & Legislative News" page (under the Practice/Reimbursement menu).

Audio Presentations Available through the Section Store

Recordings from many live Section audio conference presentations are available for purchase through the online Section Store. We're in the process of converting these recordings entirely to downloadable mp3 files for playback on your computer and/or handheld device. At this time, some of the presentations are available in CD format and others in mp3 format.

Check on the online Section Store for a complete list of titles available, as well as descriptions of the presentations.

NEW: Therapy Documentation: Life After April 1
(presented April 27, 2011)
Presenter: Cindy Krafft, PT, MS, COS-C

Pricing

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Section members - \$99
APTA members - \$149
Non-members - \$179

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