

Presentation Outline

- o eQHealth/Kepro's role as Illinois' QIO
- Overview of Retrospective Review process
 Focus on <u>Prepayment</u> Review Process
- HFS Critical Billing Errors
 - » Description and examples
- Educational Resources
- o Q & A Session



2

eQHealth/Kepro QIO Role

Serving as the Quality Improvement Organization (QIO) since 2002, eQHealth/Kepro is dedicated to supporting Providers of Illinois Medicaid fee-for-service patients to ensure they receive high quality, medically necessary care delivered in the most appropriate setting.

QIO Scope of Work

- ✓ Medical necessity review for acute inpatient care STAC/LTAC
- ✓ Quality of care review for acute inpatient care STAC/LTAC
- ✓ Medical necessity review for HFS' Family Support Program which provides access to intensive mental health services for Illinois youth

Services Do Not Include (Ø)

- Ø Medicaid Managed Care MCO
- Ø Discharge Planning
- Ø Case Management
- Ø Billing or Claims Payment



Healthsolutions

0

Retrospective Review

Review Types	Overview
Retrospective Review (prepayment)	 Performed after discharge and prior to payment Condensed medical record review Selected weekly by HFS
Retrospective Review (post-payment)	 Performed after discharge and after payment Condensed medical record review Selected monthly from paid claims data

Retrospective review takes place within 30 calendar days after the 14-day period allotted to submit the medical record.



4

Retrospective Review

This presentation will concentrate on Prepayment Review (after discharge; before payment)

- Prepayment cases are selected weekly by HFS from <u>hospital claims</u> for inpatient services that have not been reviewed concurrently. These include:
 - 1. APR DRG codes subject to review on HFS Attachment D
 - 2. Admitting diagnoses on HFS Attachment E for 1-day stays
 - Exceptions to mandatory concurrent review that HFS approves

Admitting diagnoses subject to concurrent review listed on HFS Attachments A, B and C that the hospital did not submit to eQHealth/Kepro while patient was hospitalized



- 5

5

Retrospective Review

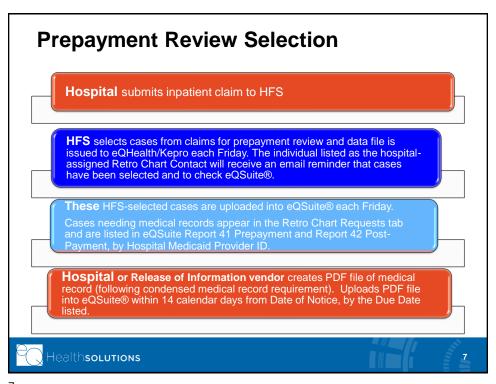
Exceptions to Mandatory Concurrent Review

HFS' Chapter H-200 Policy and Procedures For Hospital Services

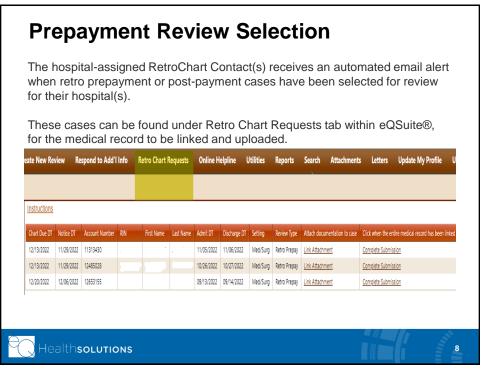
The department will allow limited exceptions in the following circumstances:

- A participant's Medicaid eligibility was backdated to cover the hospitalization.
- Medicare Part A coverage exhausted while the patient was in the hospital, but the hospital was not aware that Part A exhausted.
- Discrepancies associated with the patient's Managed Care Organization (MCO) enrollment at the time of admission.
- The patient remains unresponsive or has a physical or mental impairment that prevents the hospital from identifying coverage under one of the department's medical programs.
- Other the hospital must provide narrative description and supporting documentation.





/



Retrospective Prepayment Review

Condensed Medical Record Review Required Components

- History and Physical Examination Records
- ER/ED Records
- All Physician Orders (must include Inpatient admission order)
- Physician & Nurse Progress Notes (*)
- Discharge Summary
- *DO NOT SUBMIT documentation such as daily assessments, weights, teaching/dressing changes, I/O's, consents, discharge instructions, shift changes, or flow sheets.



a

Retrospective Prepayment Scope

A broad-scope, medical record review requires:

- ✓ Complete and accurate information

 Condensed medical record documentation
- ✓ Information for requested dates of service only

eQHealth/Kepro Prepayment Review Scope

- Critical billing errors
- Medical necessity of each day of care and appropriateness of setting
- Quality of care review



10

Prepayment Review Process

The medical necessity review can only begin after:

- 1. The medical record is received timely
- 2. There are no missing medical record components and
- 3. No critical billing errors have been identified

The review process then begins when eQHealth/Kepro's Utilization Review Nurses:

- Verify medical necessity of each day of care and appropriateness of setting
- Substantiate the performance of any invasive procedures
- Apply Centers for Medicare & Medicaid (CMS) Quality of Care Review Category screens
 - The quality-of-care review process occurs simultaneously to the medical necessity review



11

11

Prepayment Review Process

eQHealth/Kepro Nurse Review Outcomes

- Certify
 - Hospital clinical information satisfies clinical criteria
 - Centers for Medicare and Medicaid (CMS) Quality of Care Categories are met
- 2. Refer to eQHealth/Kepro Physician Reviewer
 - Hospital clinical information does not satisfy criteria
 - Quality of care screen(s) failure



12

Prepayment Review Process

Physician Review (PR) Process

- Matched by physician specialty and assigned to a PR, who uses their clinical expertise to render a determination or substantiate a quality-of-care issue. The Physician Reviewer can:
 - » Certify
 - » Render a medical necessity denial
 - » Confirm potential quality of care concern
- Notification letter sent to appropriate hospital staff
 - » Hospital-assigned Liaison
 - » Hospital-assigned Quality Contact



13

13

Reconsideration Process

The hospital or physician may request a reconsideration within 60 calendar days of the date of eQHealth Notice of Medical Necessity Denial:

- The hospital completes a reconsideration form, may request peer-to-peer and provides supplemental information to support the days denied.
- Reconsideration Form found under Provider Resources tab http://il.eqhs.com
 - $_{\circ}\,$ Fax the form and additional information to the 800# on form
- Once received the hospital receives notification letter
 - o Receipt of Reconsideration Request; or
 - o Cancellation of Reconsideration Request (untimely)



14

1 /

Cancelled Prepayment Reviews

Prepayment review is considered "cancelled" and eQHealth/Kepro review cannot be performed if:

- 1. The medical record is not received by the due date; or the medical record sent is for wrong dates of service
 - Letter of Notice of Cancelled Review
- 2. The medical record submitted does not meet the Condensed Medical Record requirement (i.e. missing sections of medical record required for clinical review).
 - Letter of Notice of Cancelled Review
- 3. Critical billing errors are found
 - Letter of Notice of Incorrect Billing Prepayment Review
 (Also denotes a cancelled review)



15

15

Critical Billing Errors

- Critical billing errors when the medical record documentation shows an inaccuracy in any of the following HFS designated areas:
 - ✓ Incorrect inpatient admission date
 - ✓ Other missing inpatient orders, missing sections of medical record, hospital submitting claim with different Provider ID, when services were already approved upon admission, et al.
 - ✓ Incorrect discharge status
 - ✓ Incorrect category of service
 - ✓ Incorrect discharge date
 - ✓ Procedure performed prior to admission
 - ✓ Multiple categories of service



Billing Errors (cancelled review)	Definition	Hospital Action
Notice of Incorrect Billing: Incorrect Admit Date	The inpatient admit date billed must match Physician order for inpatient admission. Inpatient admission date must be billed (not observation)	Clarify inpatient admission date. Resubmit claim to HFS.
Notice of Incorrect Billing: BE Other	Missing or ambiguous physician order for inpatient admission. Physician order must be signed/dated/timed. Phone or verbal orders must be authenticated. All physician orders must be included for medical necessity review.	Ensure orders are present in medical record and they are signed/dated/timed. If no inpatient order, only observation, evaluate if observation is to be billed vs. inpatient. Or if inpatient order is missing, must resubmit claim again to HFS and inform medical records of missing orders.

Billing Errors (cancelled review)	Definition	Hospital Action
Notice of Incorrect Billing: BE Other	Hospital submits claim to HFS using new HFS Provider ID; when the hospital already conducted review and received TAN under an older (incorrect) HFS Provider ID.	Hospital must check to see if inpatient dates of service were already billed to HFS. If HFS is rejecting original claim because it was billed using incorrect Provider ID, immediately request eQHealth to correct the Provider ID on the approved admission reviews.
Notice of Incorrect Billing: Incorrect Category of Service	Incorrect COS was billed, or multiple COS occurred during hospitalization	Verify correct COS . Must submit a separate claim for each service type.
Notice of Incorrect Billing: Incorrect Discharge Status or Discharge Date	The discharge status and the discharge date on the claim must match the medical record documentation.	Correct the discharge status error or the discharge date and resubmithe claim to HFS.

