

Exploring the Impact of the RAC Program on Hospitals Nationwide

Results of AHA RAC TRAC Survey, 4th Quarter 2013

March 5, 2014

RAC 101

- Centers for Medicare & Medicaid Services (CMS) Recovery Audit Contractors (RACs) conduct reviews of Medicare payments to health care providers, including:
 - automated reviews that use computer software to detect improper payments
 - complex reviews that utilize human review of medical records and other medical documentation
- Improper payments include:
 - incorrect payment amounts;
 - incorrectly coded services (including Medicare severity diagnosis-related group (MS-DRG) miscoding;
 - non-covered services (including services that are not reasonable and necessary); and
 - duplicate services
- Automated activity includes the traditional automated activity as described above as well as semi-automated review activity. These claims are denied in an automated manner if supporting documentation is not received on a timely basis.



RACTRAC Background

- AHA created RACTRAC—a free, web-based survey—in response to a lack of data provided by CMS on the impact of the RAC program on America's hospitals.
 - Hospitals use AHA's online survey application, RACTRAC (accessed at <u>www.aharactrac.com</u>), to submit their data regarding the impact of the RAC program.
 - Many survey questions are designed to collect *cumulative* RAC experience data, from the inception of a hospital's RAC activity through the 4th quarter of 2013.
 - Survey registration information and RACTRAC support can be accessed at ractracsupport@providercs.com or 1-888-722-8712.



Executive Summary

- 2,478 hospitals have participated in RAC*TRAC* since data collection began in January of 2010. 1,240 hospitals participated this quarter.
- 58% of medical records reviewed by RACs <u>did not</u> contain an overpayment, according to the RAC.
- 65% of hospitals indicated short-stay medical necessity denials were the most costly complex denials.
- 64% of short-stay denials for medical necessity were because the care was provided in the wrong setting, not because the care was medically unnecessary
- Hospitals reported appealing 49% of all RAC denials, with a 64% success rate in the appeals process.
 - The appeals overturn rate may be impacted by appeals withdrawn by hospitals for rebilling. An additional 5,880 claims were reported as withdrawn from the appeals process by hospitals during Q4 2013.



Executive Summary (cont.)

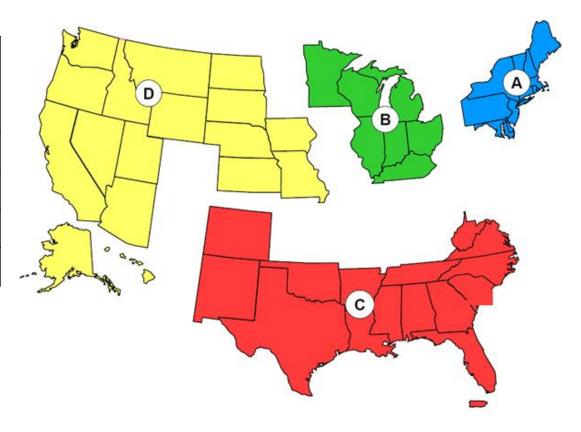
- 49% of participating hospitals reported having a RAC denial reversed through utilization of the discussion period, an increase of 6% over the previous quarter.
- 55% a sharp decline from 70% in Q3 2013 of all hospitals filing a RAC appeal during the 4th quarter of 2013 reported appealing short stay medically unnecessary denials.
- 67% of all appealed claims are still sitting in the appeals process.
- 68% of all hospitals reported spending more than \$10,000 managing the RAC process during the fourth quarter of 2013, 50% spent more than \$25,000 and 12% spent over \$100,000.



There are four RAC regions nationwide. Participation in RAC TRAC is generally consistent with hospital representation in each of the RAC regions.

Distribution of Hospitals by RAC Region and Hospitals Participating in RAC TRAC by RAC Region, through 4th Quarter 2013

	Percent of Hospitals Nationwide	Percent of Participating Hospitals by Region
Region A	15%	16%
Region B	19%	23%
Region C	40%	35%
Region D	26%	26%





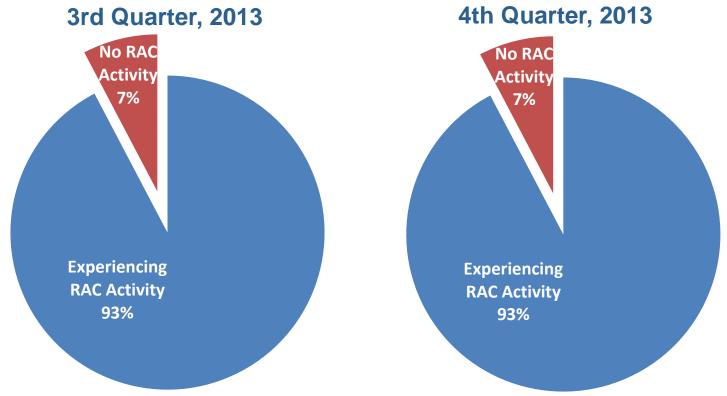
Source: Centers for Medicare and Medicaid Services



RAC Activity

Nine out of ten hospitals participating in RAC*TRAC* reported experiencing RAC activity through December 2013.

Percent of Participating Hospitals Experiencing RAC Activity, 3rd and 4th Quarter 2013

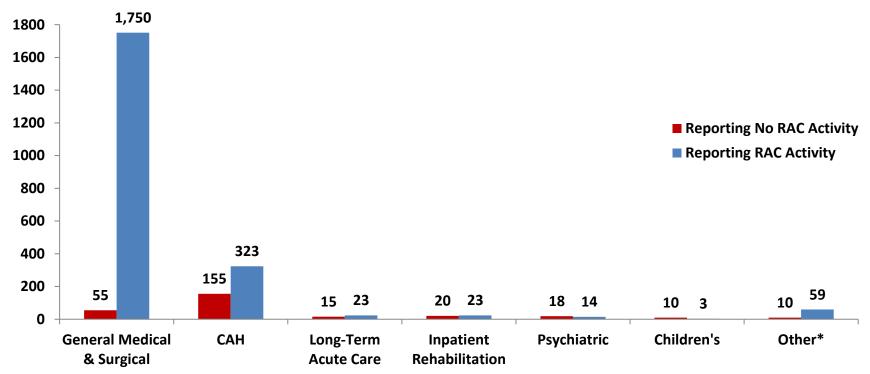




Source: AHA. (January 2014). RACTRAC Survey

The majority of hospitals reporting RAC activity are general medical and surgical hospitals.

Number of Hospitals Reporting RAC Activity by Hospital Type, through 4th Quarter 2013



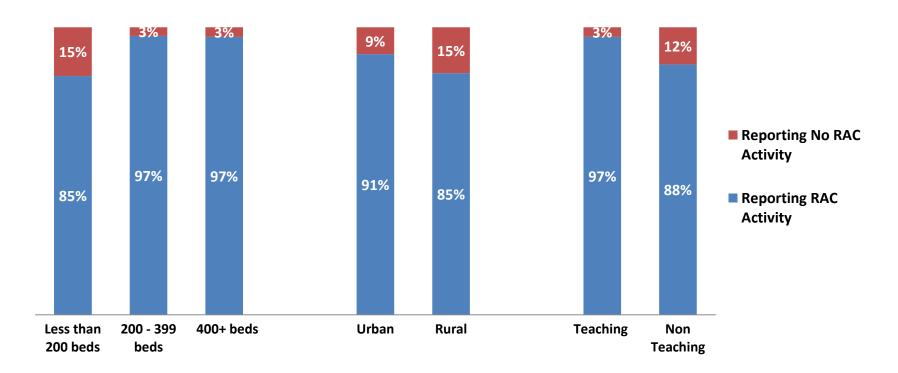
^{*}Other includes: Cancer, Chronic Disease, Alcohol and Other Chemical Dep., Heart, Obstetrics & Gynecology, Orthopedic, Other Specialty, and Surgical hospitals.



Source: AHA. (January 2014). RACTRAC Survey

Most hospitals, regardless of characteristics, are reporting that they are experiencing RAC reviews.

Percent Reporting RAC Activity vs. No RAC Activity by Type of Participating Hospital, through 4th Quarter 2013





Source: AHA. (January 2014). RACTRAC Survey

RAC Region C has the highest total number of hospitals reporting RAC activity.

Number of Participating Hospitals Reporting RAC Activity by Region, through 4th Quarter 2013





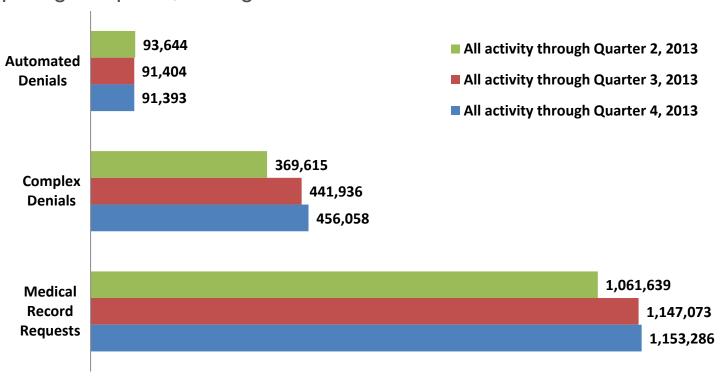
Source: AHA. (January 2014). RACTRAC Survey

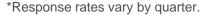


RAC Reviews

Participants continue to report increases in RAC denials and medical record requests.

Reported Automated Denials, Complex Denials and Medical Records Requests by Participating Hospitals, through 4th Quarter 2013*





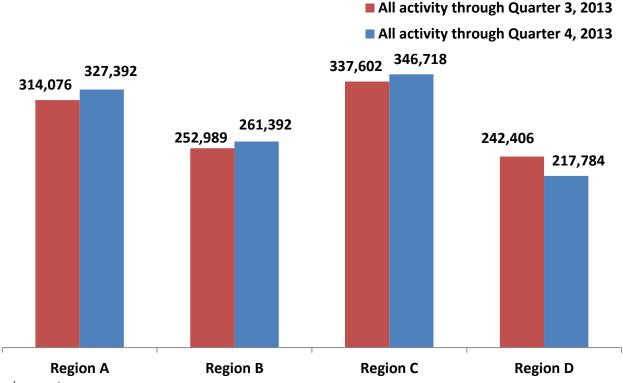
Source: AHA. (January 2014). RACTRAC Survey



Region C reports the highest total number of medical record requests; Region A has the highest average number of medical record requests per hospital.

Number of Medical Records Requested from Participating Hospitals With Complex Medical Record RAC Activity, through 4th Quarter 2013*

Average Number of Medical Record Requests per Reporting Hospital, through Q4 2013			
Region A	1,732		
Region B	1,216		
Region C	1,156		
Region D	1,274		



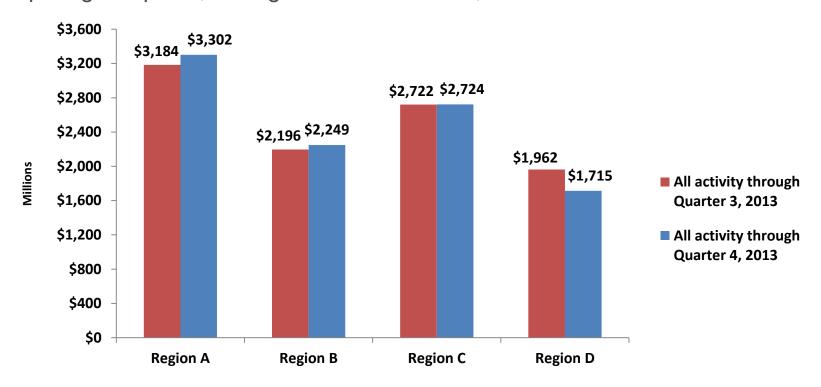


Source: AHA. (January 2014). RACTRAC Survey



Among participating hospitals, almost \$10 billion in Medicare payments were targeted for medical record requests through the 4th quarter of 2013.

Medicare Payments Associated with Medical Records Requested from Participating Hospitals, through 4th Quarter 2013, in Millions*



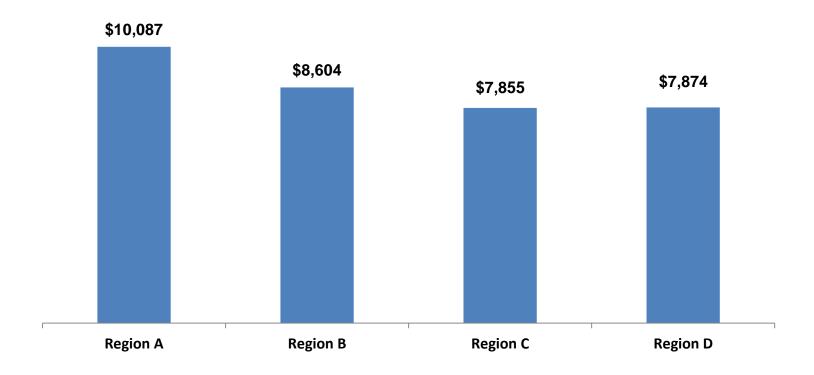


Source: AHA. (January 2014). RACTRAC Survey



The average value of a medical record requested in a complex review was highest in Region A.

Average Value of a Medical Record Requested in a Complex Review Among Hospitals Reporting RAC Activity, through 4th Quarter 2013

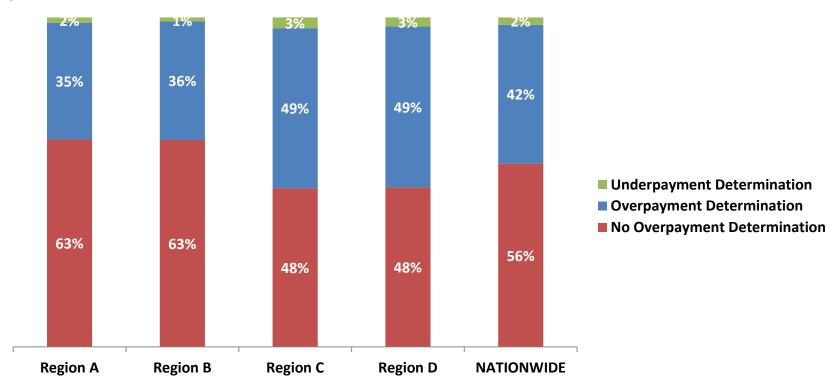




Source: AHA. (January 2014). RACTRAC Survey

56% of medical records reviewed by RACs did not contain an improper payment.

Percent of Completed Complex Reviews with and without Overpayment or Underpayment Determinations for Participating Hospitals, by Region, through 4th Quarter 2013

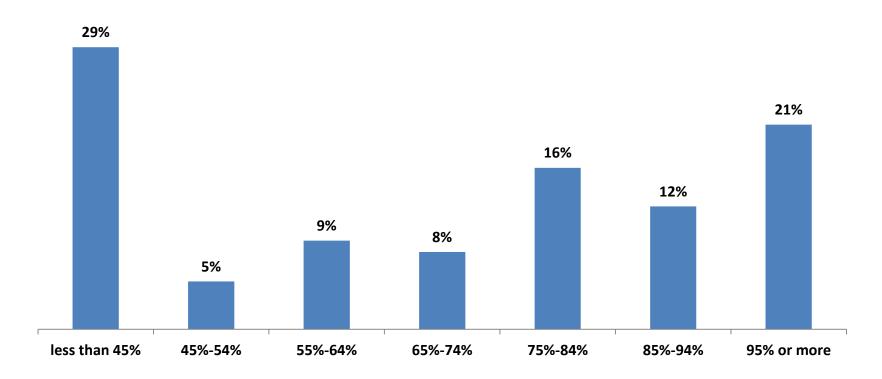




Source: AHA. (January 2014). RACTRAC Survey

49% of hospitals reported that over three-fourths of their claims were requested by a RAC after the timely filing window had elapsed.

Percent of Participating Hospitals Reporting the Percentage of Medical Records Requested after the Timely Filing Window had Elapsed, through 4th Quarter 2013





Source: AHA. (January 2014). RACTRAC Survey

AHA analysis of survey data collected from 2,478 hospitals: 2,195 reporting activity, 283 reporting no activity through December 2013. 1,240 hospitals participated this quarter. Data were collected from general medical/surgical acute care hospitals (including critical access hospitals and cancer hospitals), long-term acute care hospitals, inpatient rehabilitation hospitals and inpatient psychiatric hospitals.

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RAC Denials

\$2.6 billion in denials were reported through the 4th quarter of 2013.

Dollar Value of Automated and Complex Denials by RAC Region for Participating Hospitals, through 4th Quarter 2013, in Millions*



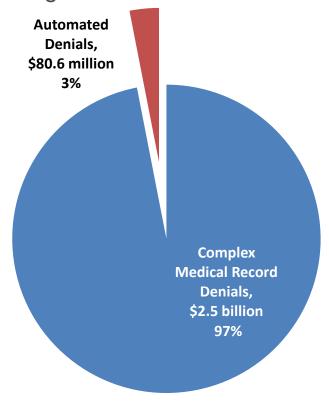


Source: AHA. (January 2014). RACTRAC Survey



97% of denied dollars were for complex denials.

Percent and Dollar Amounts of Automated Denials Versus Complex Denials for Participating Hospitals, through 4th Quarter 2013

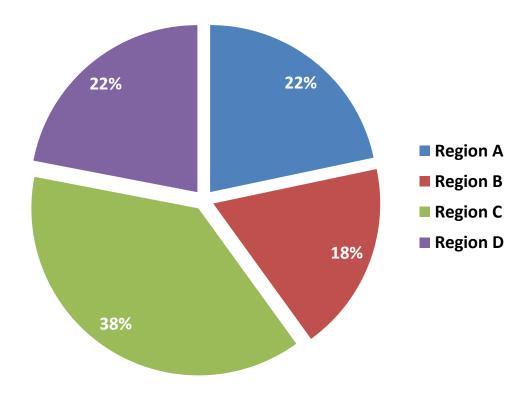




Source: AHA. (January 2014). RACTRAC Survey

RAC denials are spread among all four RAC regions.

Percent of Automated and Complex Denials by RAC Region for Participating Hospitals, through 4th Quarter 2013





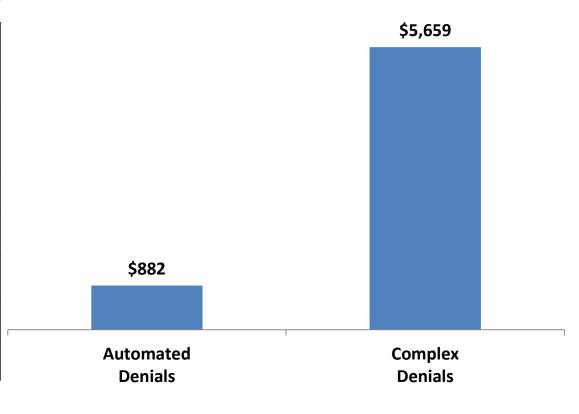
Source: AHA. (January 2014). RACTRAC Survey

The average dollar value of an automated denial was \$882 and the average dollar value of a complex denial was \$5,659.

Average Dollar Value of Automated and Complex Denials Among Hospitals Reporting RAC Denials, through 4th Quarter 2013

Average Dollar Amount of Automated			
and Complex Denials Among Reporting			
Hospitals, by Region			

RAC Region	Automated Denial	Complex Denial		
NATIONWIDE	\$882	\$5,659		
Region A	\$426	\$5,863		
Region B	\$858	\$5,212		
Region C	\$792	\$5,424		
Region D	\$1518	\$6,198		



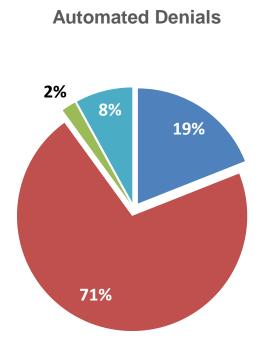


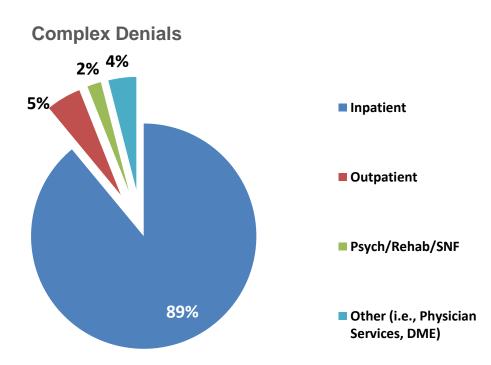
Source: AHA. (January 2014). RACTRAC Survey

In terms of dollars, the top service area for automated denials was outpatient and for complex denials, inpatient.

Percent of Participating Hospitals by Top Service Area for Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013

Survey participants were asked to rank denials by service, according to dollar impact.







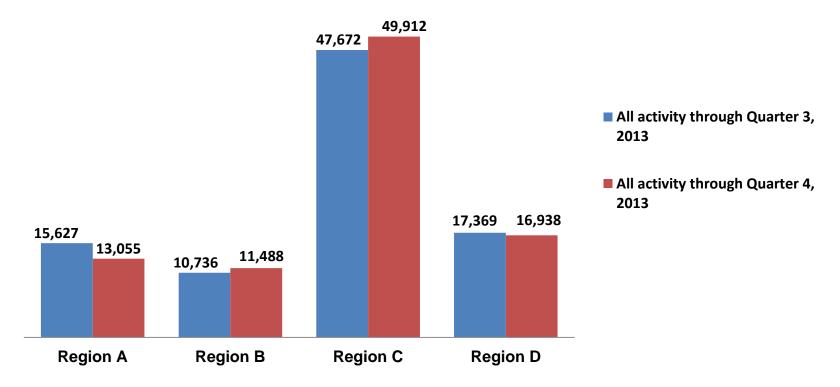
Source: AHA. (January 2014). RACTRAC Survey



Automated RAC Denials

Region C continues to experience the vast majority of all automated denial activity.

Number of Reported Automated Denials for Participating Hospitals, by Region, through 4th Quarter 2013*



^{*} Response rates vary by quarter.



Source: AHA. (January 2014). RACTRAC Survey

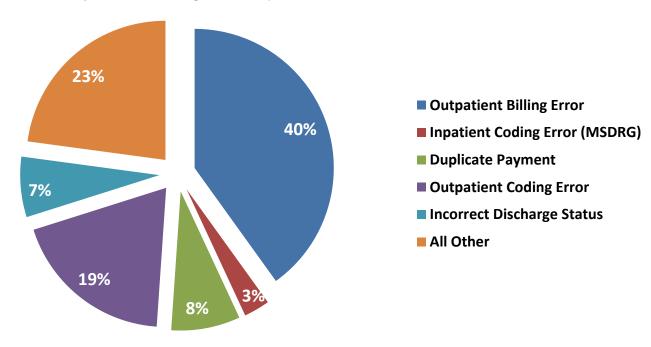
AHA analysis of survey data collected from 2,478 hospitals: 2,195 reporting activity, 283 reporting no activity through December 2013. 1,240 hospitals participated this quarter. Data were collected from general medical/surgical acute care hospitals (including critical access hospitals and cancer hospitals), long-term acute care hospitals, inpatient rehabilitation hospitals and inpatient psychiatric hospitals.

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RACs are issuing automated denials for many different reasons.

Percent of Participating Hospitals by Top Reason for Automated Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013

Survey participants were asked to rank denials by reason, according to dollar impact.



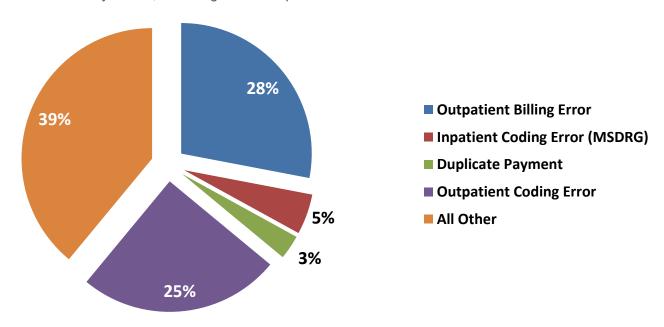


Source: AHA. (January 2014). RACTRAC Survey

Region A: A significant portion of hospitals cited "Other" as the top reason for automated denial.

Percent of Participating Hospitals by Top Reason for Automated Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region A

Survey participants were asked to rank denials by reason, according to dollar impact.



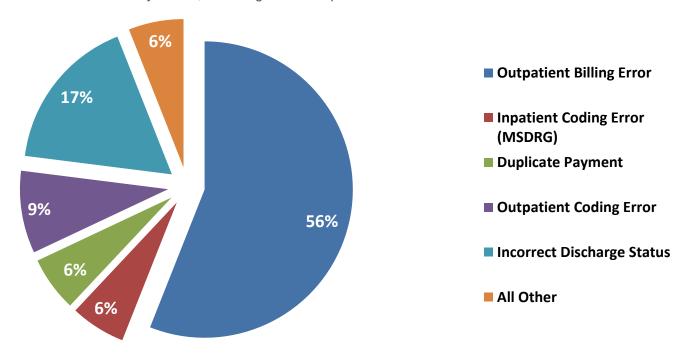


Source: AHA. (January 2014). RACTRAC Survey

Region B: Hospitals more commonly ranked outpatient billing error as the top reason for automated denials than in other regions.

Percent of Participating Hospitals by Top Reason for Automated Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region B

Survey participants were asked to rank denials by reason, according to dollar impact.





Source: AHA. (January 2014). RACTRAC Survey

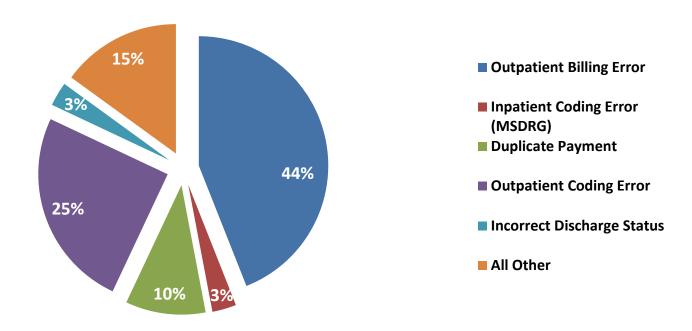
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Region C: Top denial reasons were relatively consistent with the national trend reflecting a wide range of denial reasons.

Percent of Participating Hospitals by Top Reason for Automated Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region C

Survey participants were asked to rank denials by reason, according to dollar impact.



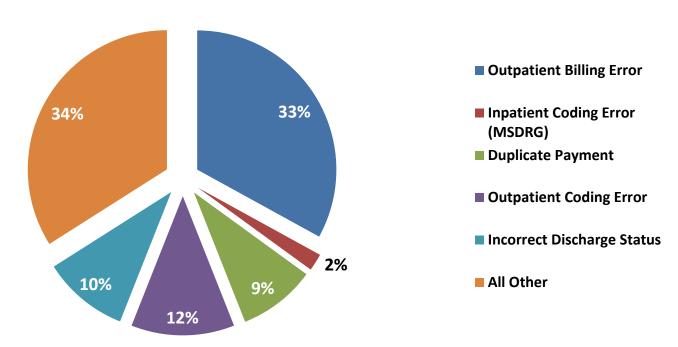


Source: AHA. (January 2014). RACTRAC Survey

Region D: 34% of hospitals cited "Other" as the top reason for automated denial.

Percent of Participating Hospitals by Top Reason for Automated Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region D

Survey participants were asked to rank denials by reason, according to dollar impact.





Source: AHA. (January 2014). RACTRAC Survey

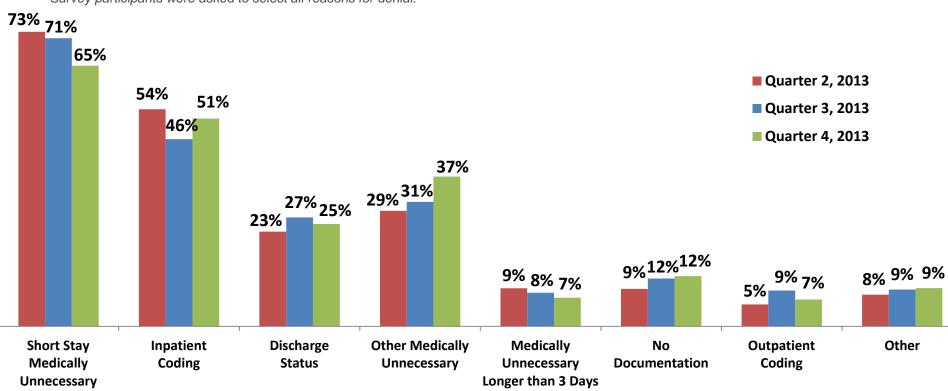


Complex RAC Denials

The most commonly cited reason for a complex denial was 'short-stay medically unnecessary.'

Percent of Participating Medical/Surgical Acute Hospitals with RAC Activity Experiencing Complex Denials by Reason, 2nd Quarter 2013 – 4th Quarter 2013

Survey participants were asked to select all reasons for denial.





Source: AHA. (January 2014). RACTRAC Survey

64% of short-stay denials for medical necessity were because the care was provided in the wrong setting, not because the care was medically unnecessary.

Reason for Medical Necessity Denials by Length of Stay Among Hospitals Reporting Medical Necessity Denials, through 4th Quarter 2013

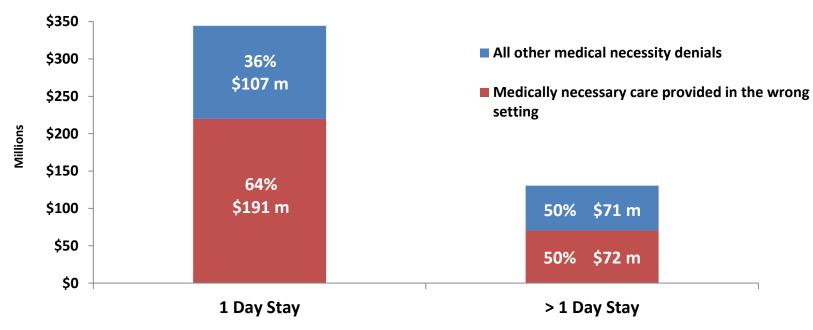


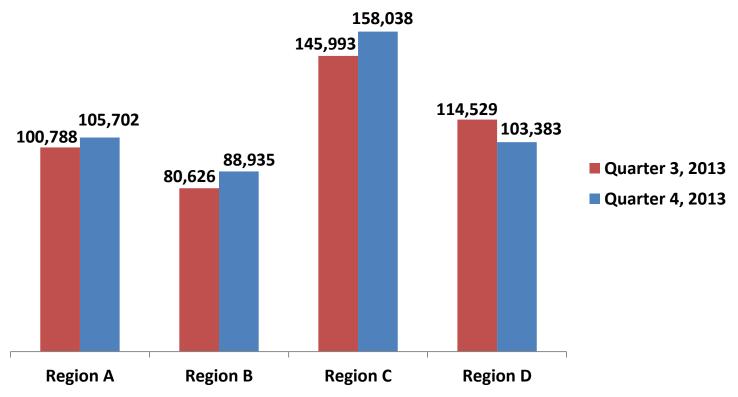
Chart includes hospitals reporting any inappropriate setting denials or the ability to track inappropriate setting denials. Not all hospital decision-support systems and RACTRAC compatible vendors have made accommodations to allow hospitals to answer this question yet. As a result, the volume of medical necessity denials for inappropriate setting may be under-represented in this chart. Furthermore, older RAC claims may not be classified as "inappropriate setting" by the hospital.



Source: AHA. (January 2014). RACTRAC Survey

All regions are reporting a significant number of complex denials.

Number of Reported RAC Complex Denials for Participating Hospitals, by Region, 3rd and 4th Quarter 2013



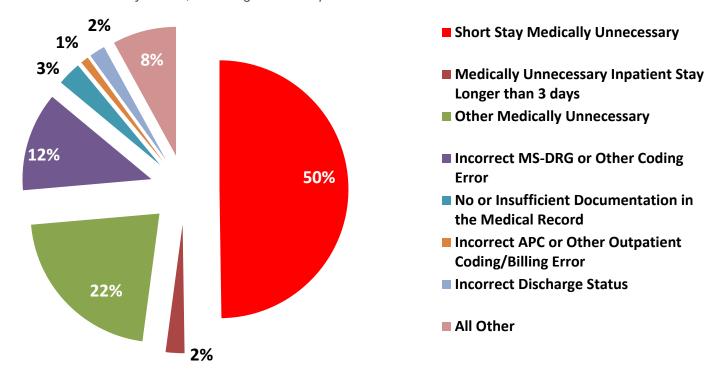


Source: AHA. (January 2014). RACTRAC Survey

50% of hospitals indicated short-stay medical necessity denials were the most costly complex denials.

Percent of Participating Hospitals by Top Reason for Complex Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013

Survey participants were asked to rank denials by reason, according to dollar impact.



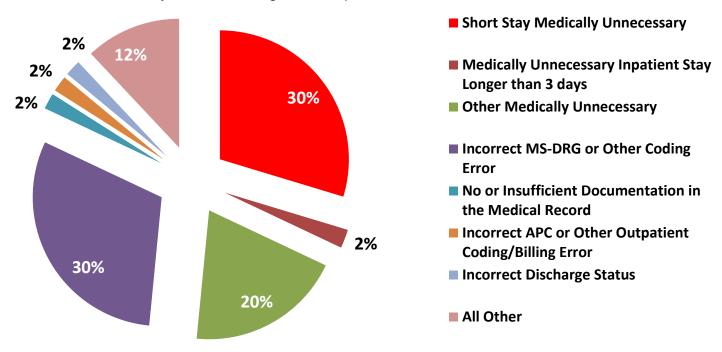


Source: AHA. (January 2014). RACTRAC Survey

Region A: 30% of hospitals identified short-stay medically unnecessary and incorrect MS-DRG or coding error as the top reasons for complex denials.

Percent of Participating Hospitals by Top Reason for Complex Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region A

Survey participants were asked to rank denials by reason, according to dollar impact.



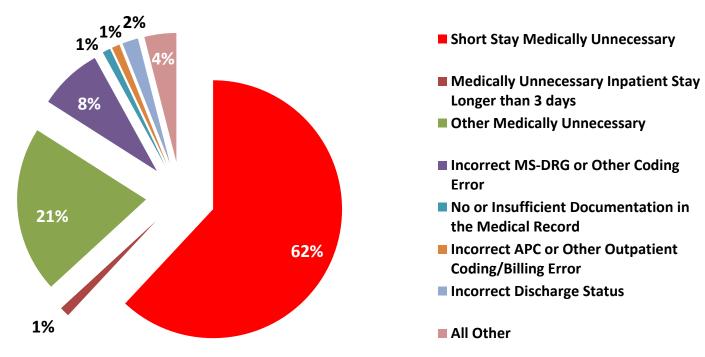


Source: AHA. (January 2014). RACTRAC Survey

Region B: Short-stay medically unnecessary was identified by 62% of hospitals as the top reason for complex denials.

Percent of Participating Hospitals by Top Reason for Complex Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region B

Survey participants were asked to rank denials by reason, according to dollar impact.



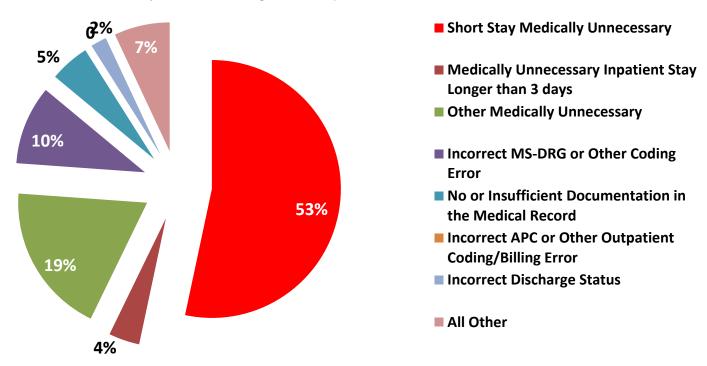


Source: AHA. (January 2014). RACTRAC Survey

Region C: Short-stay medically unnecessary was identified by 53% of hospitals as the top reason for complex denials.

Percent of Participating Hospitals by Top Reason for Complex Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region C

Survey participants were asked to rank denials by reason, according to dollar impact.



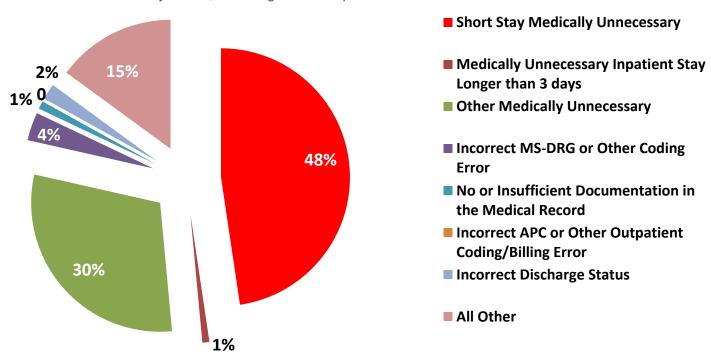


Source: AHA. (January 2014). RACTRAC Survey

Region D: Short-stay medically unnecessary was identified by 48% of hospitals as the top reason for complex denials.

Percent of Participating Hospitals by Top Reason for Complex Denials by Dollar Amount for Medical/Surgical Acute Hospitals with RAC Activity, 4th Quarter 2013, Region D

Survey participants were asked to rank denials by reason, according to dollar impact.





Source: AHA. (January 2014). RACTRAC Survey

Stents and Syncope & Collapse were the top MS-DRGs denied by RACs, in terms of dollar impact.

Percent of Participating Hospitals Reporting the MS-DRG for Medically Unnecessary and all Other Complex Denials with the Largest Financial Impact, through 4th Quarter 2013

Survey participants were asked to identify top MS-DRGs, according to dollar impact.

MS- DRG	Description	% of Hospitals
247	PERC CARDIOVASC PROC W DRUG- ELUTING STENT W/O MCC	18%
312	SYNCOPE & COLLAPSE	14%
392	ESOPHAGITIS, GASTROENT & MISC DIGEST DISORDERS W/O MCC	13%
313	CHEST PAIN	10%
69	TRANSIENT ISCHEMIA	4%

MS- DRG	Description	% of Hospitals
312	SYNCOPE & COLLAPSE	5%
981	EXTENSIVE O.R. PROCEDURE UNRELATED TO PRINCIPAL DIAGNOSIS W MCC	5%
313	CHEST PAIN	4%
247	PERC CARDIOVASC PROC W DRUG- ELUTING STENT W/O MCC	4%
166	OTHER RESP SYSTEM O.R. PROCEDURES W MCC	4%



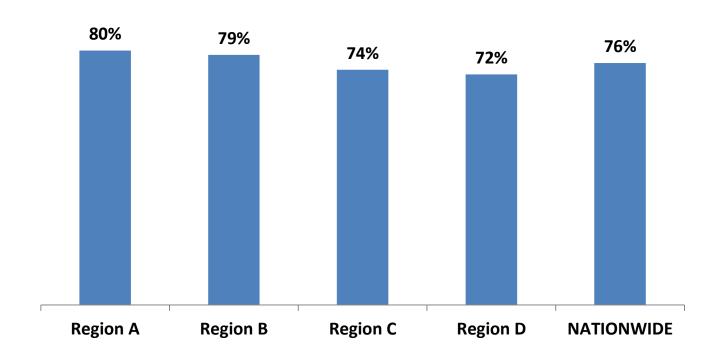
Source: AHA. (January 2014). RACTRAC Survey



Underpayments

Over three-quarters of participating hospitals nationwide with RAC activity report receiving at least one underpayment determination.

Percent of Hospitals Reporting Underpayment Determinations, By Region, through 4th Quarter 2013



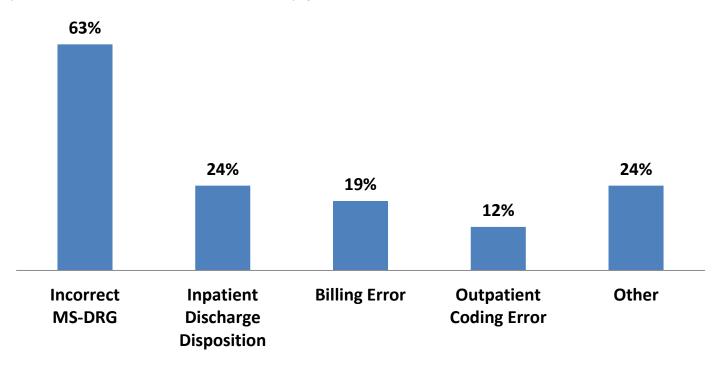


Source: AHA. (January 2014). RACTRAC Survey

63% of hospitals with underpayment determinations cited incorrect MS-DRG as the reason for the underpayment and 24% cited discharge disposition.

Percent of Participating Hospitals with RAC Activity Experiencing Underpayments by Reason, 4th Quarter 2013

Survey participants were asked to select all reasons for underpayment.





Source: AHA. (January 2014). RACTRAC Survey



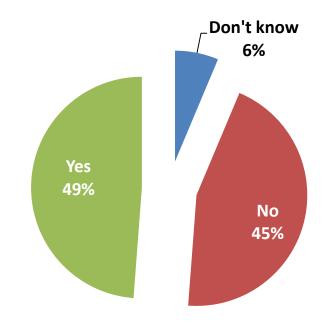
Appeals

49% of participating hospitals report having a denial reversed during the discussion period, including 65% of hospitals in Region A.

Percent of Participating Hospitals with Denials Reversed During the Discussion Period, National and by Region, 4th Quarter 2013

Reversed Denials by RAC Region

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	Yes	No	Don't Know		
Region A	65%	31%	4%		
Region B	49%	46%	5%		
Region C	48%	43%	9%		
Region D	37%	59%	5%		



The discussion period is intended to be a tool that hospitals may use to reverse denials and avoid the formal Medicare appeals process. All RACs are required to allow a **discussion period** in which a hospital may share additional information and discuss the denial with the RAC. During the discussion period a hospital may gain more information from the RAC to better understand the cause for the denial and the RAC may receive additional information from the hospital that could potentially result in the RAC reversing its denial.

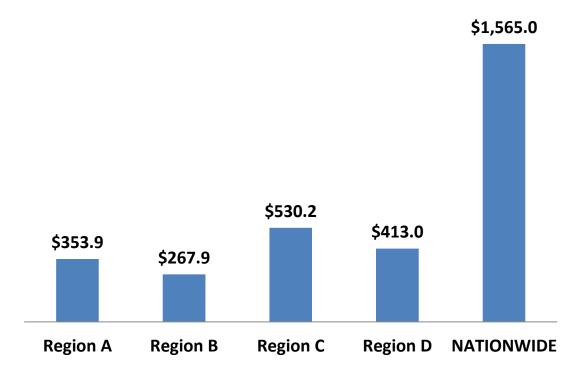


Source: AHA. (January 2014). RACTRAC Survey

The value of appealed claims exceeds \$1.5 billion dollars. Hospitals report appealing an average of 345 claims to date.

Total Dollar Value, Percent and Average Number of Appealed Claims for Hospitals with Automated or Complex RAC Denials, through 4th Quarter 2013, Millions

	Percent of Hospitals with Any Appealed Denials	Average Number of Appealed Denials per Hospital
NATIONWIDE	88%	345
Region A	87%	340
Region B	87%	248
Region C	92%	365
Region D	84%	421





Source: AHA. (January 2014). RACTRAC Survey

Nationwide hospitals report appealing 49% of RAC denials including over half of all denials in Region D.

Total Number and Percent of Automated and Complex Denials Appealed by Hospitals with Automated or Complex RAC Denials, by Region, through 4th Quarter 2013

	Total Number of Denials Available* for Appeal	Total Number of Denials Appealed	Region A Region B	54% 54%	46%	 ■ No
NATIONWIDE	547,451	268,414	-			A
Region A	118,757	54,434	Region C	51%	49%	■ Ap
Region B	100,423	46,452	-			ı
Region C	207,950	101,462	Region D	45%	55%	
Region D	120,321	66,066	NATIONWIDE	51%	49%	

^{*} Available for appeal means that the hospital received a demand letter for this claim, as a result of either automated or complex review.

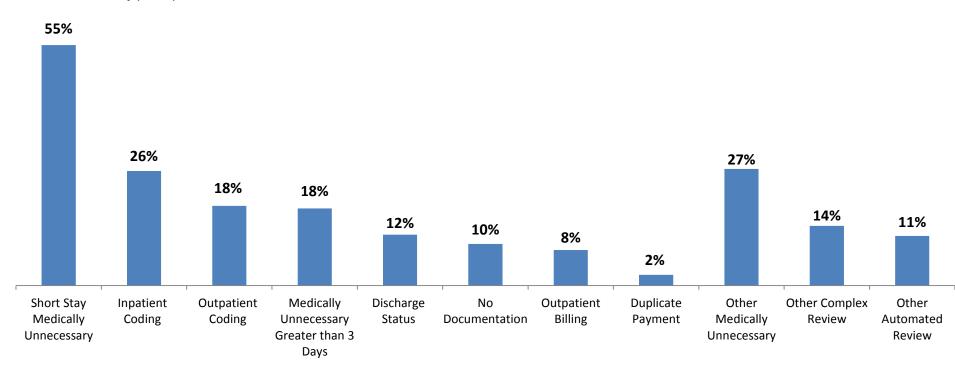


Source: AHA. (January 2014). RACTRAC Survey

55% of all hospitals filing a RAC appeal during the 4th Quarter of 2013 reported appealing short stay medically unnecessary denials.

Percent of Participating Medical/Surgical Acute Hospitals Reporting RAC Appeals by Denial Reason, 4th Quarter 2013

Survey participants were asked to select all reasons for denial.

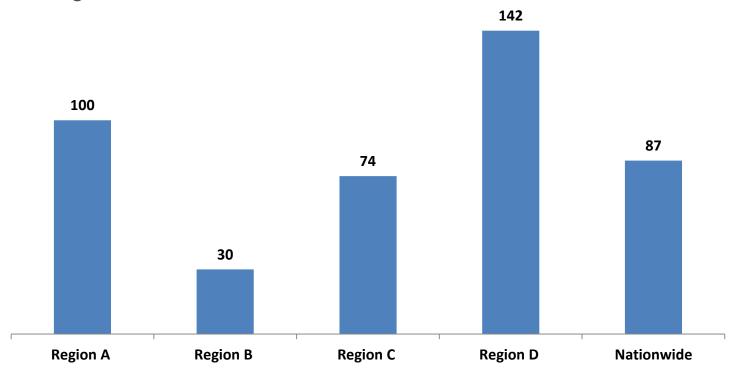




Source: AHA. (January 2014). RACTRAC Survey

Hospitals are receiving many notices from QICs stating that issuing a determination on a RAC appeal will take longer than the statutory maximum of 60 days.

Average Number of Claims per Participating Hospital Where the QIC Reported the Inability to Complete an Appeal Review within the Required 60 Day Window from Receipt, through 4th Quarter 2013

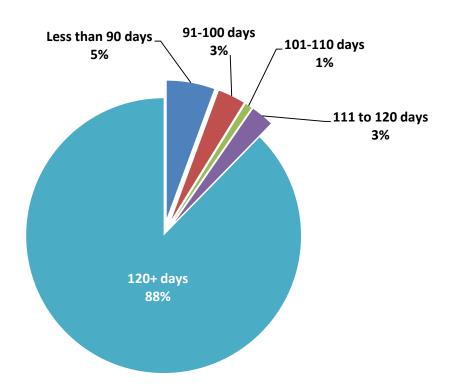




Source: AHA. (January 2014). RACTRAC Survey

95% of reporting hospitals have experienced at least one delay longer than the statutory limit of 90 days for an ALJ determination to be issued.

Percentage of Reporting Hospitals by Longest Delay Experienced for ALJ to Issue a Decision on an Appeal, for Participating Hospitals, 4th Quarter 2013

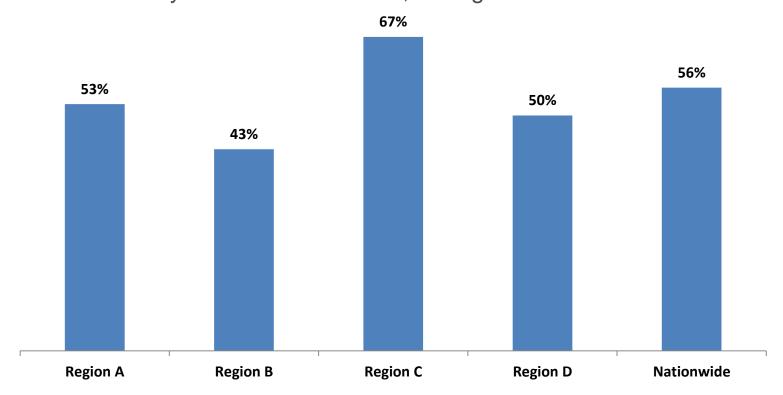




Source: AHA. (January 2014). RACTRAC Survey

For over 50% of claims appealed to the ALJ, the judge has taken longer than the statutory limit of 90 days to provide a determination to the hospital.

Percent of Appeals for which ALJ has taken Longer than the Statutory Maximum of 90 Calendar Days to Issue a Decision, through 4th Quarter 2013

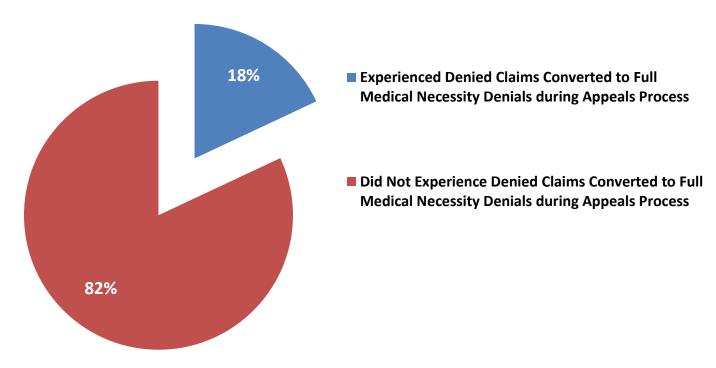




Source: AHA. (January 2014). RACTRAC Survey

18% of reporting hospitals reported having claims denied for DRG Validation converted into full medical necessity denials when the determination was appealed.

Percent of Responding Hospitals Experiencing Denied Claims Converted to Full Medical Necessity Denials during Appeals Process, 4th Quarter 2013

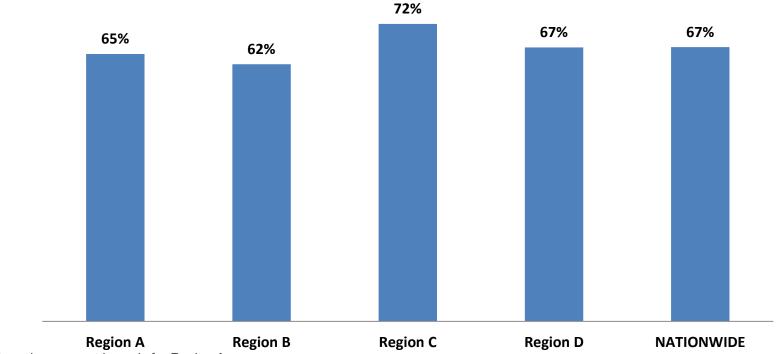




Source: AHA. (January 2014). RACTRAC Survey

67% of all cumulative claims appealed are still sitting in the appeals process.

Percent of Appealed Claims Pending Determination for Participating Hospitals, by Region, through 4th Quarter 2013*



Manual survey entries only for Region A.

*Response rates vary by quarter.

Source: AHA. (January 2014). RACTRAC Survey



Of the claims that have completed the appeals process, 64% were overturned in favor of the provider.

Summary of Appeal Rate and Determinations in Favor of the Provider, for Hospitals with Automated or Complex RAC Denials, through 4th Quarter 2013*

·				Completed Appeals		
	Appealed	Percent of Denials Appealed	Number of Denials Awaiting Appeals Determination	Number of Denials Not Overturned from Appeals Process** (Withdrawn/Not Continued)	Number of Denials Overturned in the Appeals Process	Percent of Appealed Denials Overturned (as a Percent of Total Completed Appeals)
NATIONWIDE	233,607	50%	159,112	25,797	46,297	64%
Region A*	19,627	48%	12,757	3,084	3,626	54%
Region B	46,452	46%	29,023	6,119	10,754	64%
Region C	101,462	49%	73,344	8,514	19,089	69%
Region D	66,066	55%	43,988	8,080	12,828	61%

^{*}Manual survey entries only for Region A. Due to survey submission error, total appeals may be greater than the sum of ending/withdrawn/overturned appeals.

^{**} May include appeals withdrawn to re-bill.

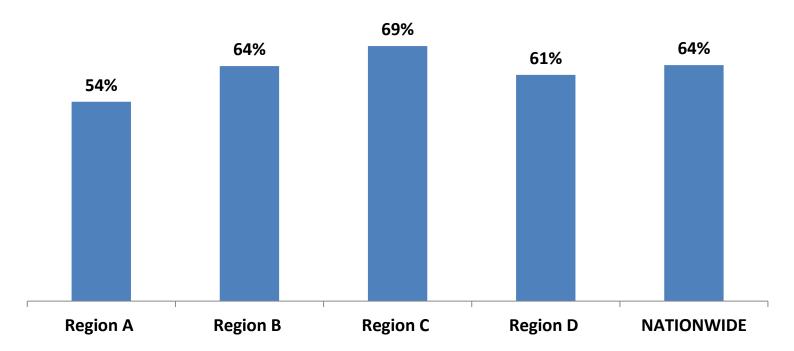


Source: AHA. (January 2014). RACTRAC Survey



When hospitals choose to appeal, they win 64% of the time. Region C has the highest overturn rate upon appeal at 69%.

Percent of Completed Appeals with Denials Overturned for Participating Hospitals, by Region, through 4th Quarter 2013*



Manual survey entries only for Region A.

*Response rates vary by quarter.

Source: AHA. (January 2014). RACTRAC Survey



Hospitals reported a total of \$263 million in overturned denials, with \$87.6 million in Region C alone.

Value of Denials Overturned in the Appeals Process, by Region, through 4th Quarter 2013, in Millions



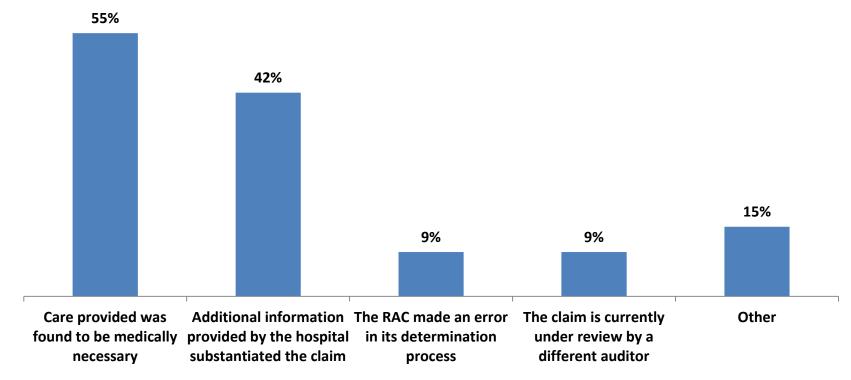


Source: AHA. (January 2014). RACTRAC Survey

55% of hospitals with a RAC denial overturned had a denial reversed because the care was found to be medically necessary.

Percent of Participating Hospitals That Had a Denial Overturned by Reason, 4th Quarter 2013

Survey participants were asked to select all reasons for appeal overturn.





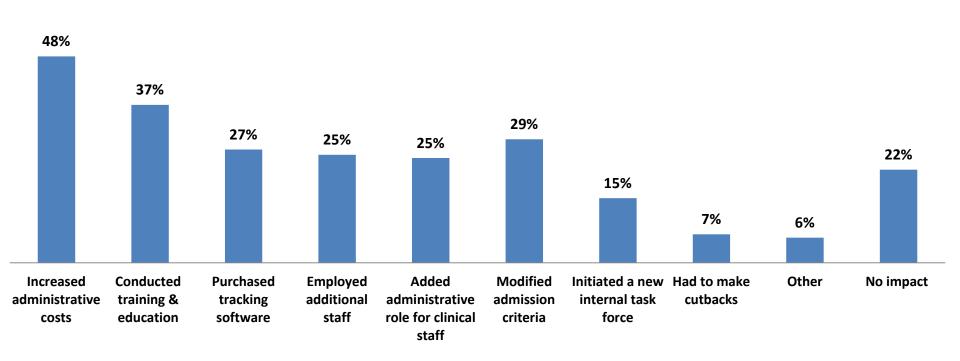
Source: AHA. (January 2014). RACTRAC Survey



Administrative Burden

Hospitals experience many types of impacts due to RACs; almost half of all reporting hospitals noted they had increased administrative costs due to the program.

Impact of RAC on Participating Hospitals* by Type of Impact, 4th Quarter 2013



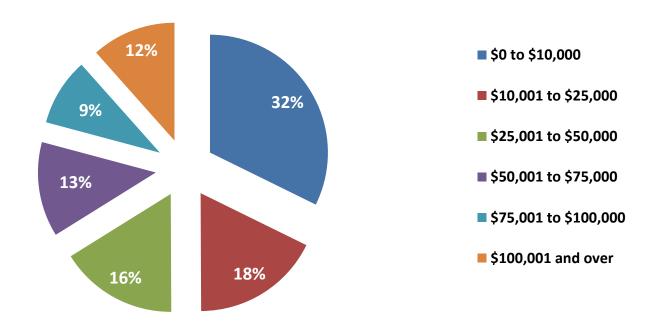
^{*} Includes participating hospitals with and without RAC activity



Source: AHA. (January 2014). RAC*TRAC* Survey

68% of all hospitals reported spending more than \$10,000 managing the RAC process during the 4th quarter of 2013, 50% spent more than \$25,000 and 12% spent over \$100,000.

Percent of Participating Hospitals* Reporting Average Cost Dealing with the RAC Program, 4th Quarter 2013



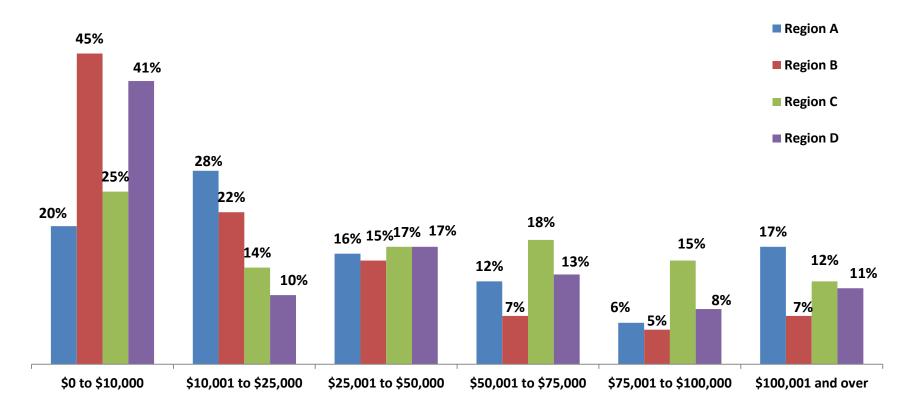
^{*} Includes participating hospitals with and without RAC activity





The additional cost of managing the RAC program varies by region.

Percent of Participating Hospitals* Reporting Additional Cost of Managing the RAC Program, by Region, 4th Quarter 2013



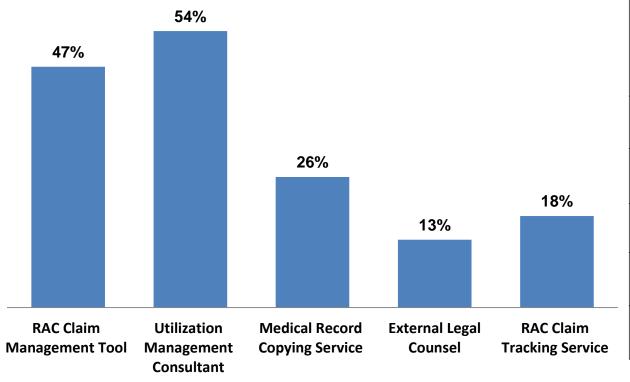


Source: AHA. (January 2014). RACTRAC Survey

Many hospitals report spending on external resources, such as outside consultants, to deal with the RAC process.

Percent of Participating Hospitals* that Use External Resources by Type and

Average Dollars Spent this Quarter, 4th Quarter 2013



Administrative Burden	Average Dollar Amount This Quarter
Utilization Management Consultant	\$ 52,921
External Legal Counsel	\$ 30,036
RAC Claim Management Tool	\$ 8,092
RAC Claim Tracking Service	\$ 7,707
Medical Record Copying Service	\$ 3,139

^{*} Includes participating hospitals with and without RAC activity. Average dollars spent and percentages reflect only those hospitals that reported utilizing external resources.

Source: AHA. (January 2014). RACTRAC Survey



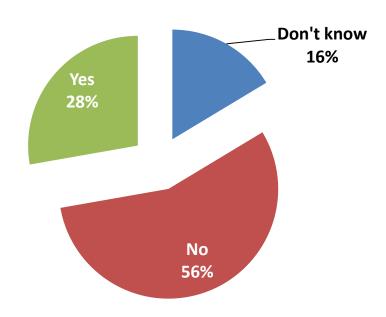
Nearly three out of five of respondents indicated they have yet to receive any education related to avoiding payment errors from CMS or its contractors.

Percent of Participating Hospitals Reporting they Received Education from CMS or its Contractors, National and by Region, through 4th Quarter 2013

Reported Education by RAC Region

	Yes	No	Don't Know
Region A	32%	49%	19%
Region B	25%	56%	19%
Region C	28%	60%	12%
Region D	26%	55%	19%

National Reporting



^{*} Includes participating hospitals with and without RAC activity

Source: AHA. (January 2014). RACTRAC Survey



For those hospitals that have received education, the perceived quality varied by region.

Percent of Participating Hospitals Reporting the Effectiveness of Received Education from CMS or its Contractors, National and by Region, through 4th Quarter 2013

Reported Effectiveness of Education by RAC Region

	Excellent	Good	Fair	Poor
Region A	3%	43%	45%	10%
Region B	2%	46%	41%	11%
Region C	0%	38%	49%	13%
Region D	2%	40%	47%	11%

National Reporting





Source: AHA. (January 2014). RACTRAC Survey



Hospitals report widespread RAC process-related issues, including extensive problems with MACs providing hospitals with a demand letter in a timely fashion.

Percent of Participating Hospitals Reporting RAC Process Issues, by Issue, 4th Quarter 2013

Not receiving a demand letter informing the hospital of a RAC denial

Long lag (greater than 30 days) between date on review results letter
and receipt of demand letter

RAC is rescinding medical record requests after you have already

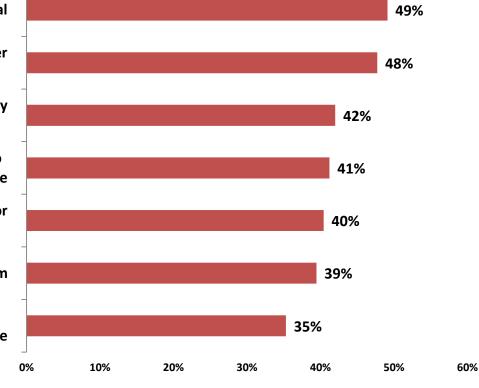
Problems reconciling pending and actual recoupment due to insufficient or confusing information on the remittance advice

submitted the records

Demand letters lack a detailed explanation of the RAC's rationale for denying the claim

RAC not meeting 60-day deadline to make a determination on a claim

Receiving a demand letter announcing a RAC denial and pending recoupment AFTER the denial has been reported on the remittance



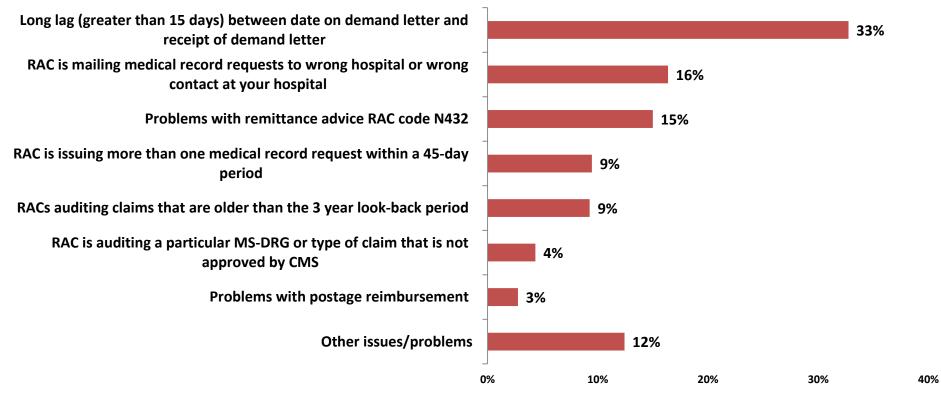


^{*} Includes participating hospitals with and without RAC activity

Source: AHA. (January 2014). RACTRAC Survey

Hospitals continue to report a wide variety of RAC process problems.

Percent of Participating Hospitals Reporting RAC Process Issues, by Issue, 4th Quarter 2013

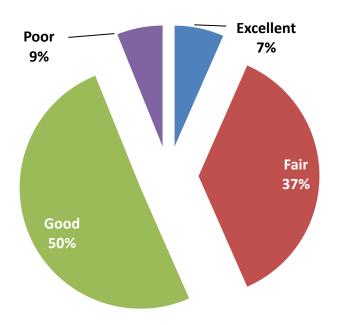




* Includes participating hospitals with and without RAC activity Source: AHA. (January 2014). RAC TRAC Survey

The majority of hospital respondents indicated RAC responsiveness and overall communication was "fair" or "good."

Participating Hospitals Rating of RAC Responsiveness and Overall Communication, 4th Quarter 2013





Source: AHA. (January 2014). RACTRAC Survey

Participating hospitals rated RAC responsiveness and communication lowest in Region C.

Participating Hospital Rating of RAC Responsiveness and Overall Communication, by Region, 4th Quarter 2013

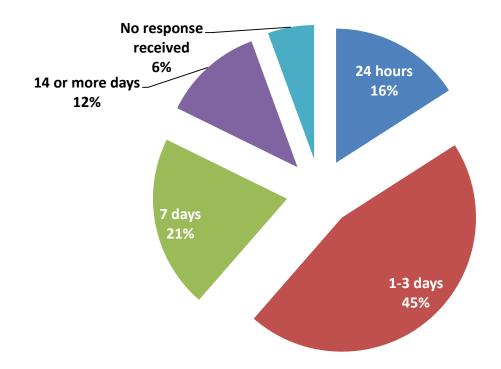
	Excellent	Good	Fair	Poor
Region A	15%	68%	15%	2%
Region B	3%	54%	38%	5%
Region C	6%	42%	44%	8%
Region D	5%	45%	43%	7%



Source: AHA. (January 2014). RACTRAC Survey

The average wait time for a RAC response varied significantly, with nearly 20 percent of hospitals reporting they did not receive a response from their RAC within 2 weeks.

Average Number of Days it Took RACs to Respond to Hospital Inquiries for Participating Hospitals, 4th Quarter 2013





Source: AHA. (January 2014). RACTRAC Survey

RAC response time varied by region.

Average Number of Days For RACs to Respond to Hospital Inquiries for Participating Hospitals, by Region, 4th Quarter 2013

	24 hours	1-3 days	7 days	14 or more days	No Response Received
Region A	32%	41%	17%	8%	2%
Region B	12%	53%	19%	12%	4%
Region C	11%	46%	23%	11%	9%
Region D	13%	40%	24%	19%	3%



Source: AHA. (January 2014). RACTRAC Survey



For more information visit AHA's RACTRAC website:

http://www.aha.org/ractrac