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## Tips from the RAC Cave: "Pre-RAC Audits vs. RAC Preparation"

*RAC Man and QIC Boy Wonder*

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**CMS Proposes to Both Ease and Tighten Physician Supervision Requirements for Hospital Outpatient Services**

**Medicare Payment for Consultation Codes to be Eliminated by CMS Proposed Rule**

*Tips from the RAC Cave: "Pre-RAC Audits vs. RAC Preparation"*

If you have not already conducted a pre-RAC audit, don't initiate one now just because of the RACs. Instead, focus your resources on RAC preparation through identification and establishment of internal staff (the RAC Team) to address the upcoming RAC attacks and development and implementation of internal protocols and policies, to track and document the RAC audit and appeal process. Of course, you should continue your routine or scheduled internal audits pursuant to your compliance program. If you want to conduct a pre-RAC audit anyway, then hire a consulting firm rather than a law firm. It's usually more cost-effective. Depending on the audit topics, however, work with your in-house or outside counsel to hire the consulting firm in order to maintain attorney-client privilege. Remember: the RAC is a red herring if you discover a billing compliance problem that implicates issues related to voluntary disclosure and refund. In other words, if a billing compliance issue that could require a voluntary disclosure or refund is identified during your preparation for a RAC audit or as a result of a RAC review, your primary concern should be to address the issue pursuant to your compliance plan, as necessary.

In our next issue, same RAC time, same RAC channel: "Hearings: Telephone vs. Video"

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### Payment Group

#### Principals

Thomas W. Coons

Leslie Demaree Goldsmith

Carel T. Hedlund

S. Craig Holden

Julie E. Kass

Paul W. Kim

Robert E. Mazer

Christine M. Morse

Laurence B. Russell

Donna J. Senft

Susan A. Turner

**Associates**

Kristin Cilento Carter

Joshua J. Freemire

Mark A. Stanley

Lisa D. Stevenson