

## Report on Medicare Compliance Volume 32, Number 15. April 17, 2023 With Ounce of Prevention in Mind, Checklist Is Required After RAC Audit of SNS Procedure

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By Nina Youngstrom

It's a good compliance move for hospitals to ask urologists to complete a checklist before scheduling sacral nerve stimulation (SNS), a procedure to treat urinary and fecal incontinence, a physician advisor says. A checklist will help ensure they have jumped through Medicare and Medicare Advantage coverage hoops.

Stephanie Van Zandt, M.D., medical director of physician advisor services, utilization management and complex managed care denials at a health system, said this step was added after recovery audit contractor (RAC) audits of SNS implantation before the COVID-19 pandemic. "When the doctors call to schedule them, they have to have this checklist," which is barcoded and loaded into the patient's chart.<sup>[1]</sup>

The checklist is an ounce of prevention for SNS procedures, which have been a RAC approved target since 2017. According to the CMS website, RACs are doing complex reviews of SNS to determine whether documentation of the procedure meets Medicare coverage criteria and/or is medically reasonable and necessary. But RACs are not permitted to deny claims for SNS device replacements caused by dying batteries or frayed leads. CMS said in an April 6 email to Ronald Hirsch, M.D., vice president of R1 RCM, that there was an "enhancement to the review" in early 2021 to prevent denials for these reasons. "Should a provider not agree with the outcome of the RAC's review, we first recommend the discussion period and subsequently the appeals process," the email stated.

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