

HRSA COVID Uninsured Fund: Testing Risk & Compliance

Mitigate Risk & Ensure Compliance

The HRSA Fund was created at the height of the COVID-19 pandemic to make testing available for the uninsured. The program had specific requirements for validating that a patient was uninsured. New diagnosis, procedure and testing codes were created and certain special waivers put in place, which inevitably presented the potential for misuse and misconduct.¹

RISKS OUR EXPERTS SEE INCREASING

FTI Consulting experts are seeing a rise in regulatory scrutiny related to miscoding of COVID-19 tests and associated provider visits that often lead to an overpayment. Other government payers – regulators such as CMS, HHS, DOJ and OIG — may be questioning the frequency of testing performed on some patients or the codes that are being billed in conjunction with COVID-19 lab tests. In addition, both commercial payers and regulators are questioning fees (price gouging) along with the bundle of services charged and reported for COVID testing.²

HOW WE CAN HELP

Internal Proactive Compliance

Our experts provide third-party assessments of risks associated with federal funding (including HRSA, Medicare, Medicaid) and COVID-19 testing. We help clients ensure compliance, identify potential risk areas and remediate any historical issues.

Billing & Coding

We provide guidance on the use of COVID-19 testing codes based on the lab requirements associated, e.g., Clinical Laboratory Improvement Amendments (CLIA) waived, CLIA independent or high-complexity lab, as well as guidance related to additional codes that providers may have been billing in conjunction with the testing codes.

For providers who billed a separate code although the actual test collection was embedded in the evaluation and management (E/M) visit, our experts help clients to assess repayment needs and correct related issues going forward.

Investigations and Disputes

Clients rely on our advanced data and analytics capabilities to support them through investigations and disputes. Our team brings extensive experience with lab billing and pricing disputes and investigations, including experience serving as an Independent Review Organization to support our clients. We also have economists on our team who have dealt with price gouging and economic issues.



CASE STUDY

Billing & Coding Compliance For A Healthcare Provider

SITUATION

An urgent-care provider that administered COVID tests during the pandemic engaged our experts to assess whether the appropriate lab test codes were utilized and whether the appropriate E/M codes were billed for those visits.

OUR ROLE

Our client was concerned that medically necessary and appropriate E/M codes were not billed according to CMS guidance and that incorrect COVID-19 testing codes were utilized.

OUR IMPACT

Through data analysis, we identified which COVID-19 testing codes were billed in order to determine whether the appropriate code was utilized and, if not, whether there was a corresponding repayment. We also assisted our client in determining that certain codes could not be billed in conjunction with E/M codes, and ascertaining whether the billed E/M code was supported by the documentation. Our work resulted in a repayment to certain federal payers and an update to the client's internal policies.



CASE STUDY

Economic Assessment Of Covid-19 Testing Prices

SITUATION

A regional health insurance company filed a complaint against a COVID testing laboratory for price gouging and performing unnecessary tests.

OUR IMPACT

Our analysis, assessment and report led to an expedited settlement favorable to our client.



CASE STUDY

Internal Audit of National Testing Laboratory

SITUATION

A national testing laboratory requested an internal audit of its HRSA COVID claims. Based on a sample of the lab's HRSA claims, FTI Consulting conducted an audit that included a review of the patient questionnaire and consent form, insurance eligibility results and physician requisition order.

OUR IMPACT

The results of our audit were used by the client to improve internal processes and controls.

¹["Covid-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured."](#)

²[Adler, Loren, and Christen Linke Young. "The Laws Governing Covid-19 Test Payment and How to Improve Them."](#)

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