

Reimbursement And Regulatory Update In Dialysis Access

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VEITH SYMPOSIUM 2024

Disclosures



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Dialysis Access Headwinds 2024

- Post Pandemic Catheter Rate is more than 20%
- Staff shortages/new staff and travelers are impacting cannulation as well as referrals for timely access care
- More than 50% of the dialysis patients now have Medicare Advantage insurance
 - Very difficult to obtain contracts and long delays in obtaining authorizations
- Many surveillance programs on hold due to lack of staff to perform testing
- Access Centers report increases in thrombectomy rates/Angioplasty rates are down/Catheter cases up
- Vascular Access management is a key component to Value Based Care
- Kidney patients lose again!

2025 AV Access Repair Comparisons

	2025 Physician Office Global (Final) *	2025 HOPD Global (Final) †	2025 ASC Global (Final) ‡	Office as % of HOPD	Office as a % of ASC
Angiogram 36901	\$654	\$1,713	\$688	38%	50%
Angioplasty 36902	\$1,113	\$5,928	\$2,856	19%	39%
Stent 36903	\$3,845	\$11,639	\$7,650	93%	50%
Decloct 36904	\$1,667	\$6,050	\$3,864	28%	43%
Decloct+stent 36905	\$2,087	\$11,758	\$6,910	18%	30%
Decloct+stent 36906	\$4,905	\$18,439	\$12,265	27%	40%
Central stent 36907	\$545	NA	NA	NA	NA
Central stent 36908	\$1,298	NA	NA	NA	NA
Embolization 36909	\$1,719	NA	NA	NA	NA
*Physician Fee Schedule Nonfacility Total					
†Hospital Outpatient PPS Payment Rate + PPS Facility Total					
‡Wambulatory Surgical Center PPS Payment Rate + PPS Facility Total					

As we fight rate cuts, enforcement actions harm our image \$88 million in fines over last 6 years related to Dialysis Access

- United States Files Claims Alleging Fresenius Vascular Care, Inc. Defrauded Medicare and Other Healthcare Programs by Billing for Unnecessary Procedures Performed on Dialysis Patients
- Civil Fraud Complaint Alleges Unnecessary Procedures Performed on Patients with End Stage Renal Disease Were Potentially Harmful
- DaVita subsidiary under investigation by Feds for 'medical necessity' of dialysis access cases
- Vascular Surgeon Admits Doing Unnecessary Procedures
 - Feng Qin, MD, will pay \$800,000 and be excluded from Medicare for 4 years
- Bay City Vascular Surgeon Pleads Guilty to Defrauding Medicare, Medicaid and Blue Cross Blue Shield
- Missouri vascular surgeon settles alleged health care fraud claims for \$3.7 million
- Doctor Guilty in \$19M Fraud Used Dialysis, Blood Clot Dialysis Patients in Scheme
- Vascular Access Centers L.P. has been accused of Medicare fraud, violating the False Claims Act, and have agreed to pay \$3.825 million to resolve the allegations.

Vascular Cases Are Targets for OIG \$5 ROI for every \$1 invested

[Enforcement Actions | Office of Inspector General | Government Oversight | U.S. Department of Health and Human Services \(hhs.gov\)](https://www.oig.hhs.gov/enforcement-actions/) for a full list of actions



BE AWARE OF THE LEGAL ENVIRONMENT



KNOW THE RULES AROUND BILLING COMPLIANCE



CREATE A CULTURE OF COMPLIANCE IN YOUR PRACTICE

Vascular Access Cases have similar themes

More than half are whistleblower actions	Whistleblowers can collect up to 30% of the fine
Analytic team at OIG has an algorithm for "91+ Day Angioplasty"	Many cases lack proper referrals/medical indications
Radiographic images do not always support stenosis >50%	Vascular Cases have higher reimbursement/higher ROI for OIG

What Can I Do to Protect My Practice?

- Compliance Program is Critical (OIG Website has model compliance program 7 standards)-Compliance Training for ALL staff
- Orders are required for interventions-Review your referral form
- Documentation is key-Medical necessity of all you do must be charted
- Know any Medicare Local or National Coverage Decisions
- Ensure your billing group reviews coding
- Periodically have someone review your billing and images
- Review any request for Medical Records
- Make sure your billing team knows what to identify as possible investigation

Reimbursement And Regulatory are Important

- Stay Aware
- Stay Informed
- Document, document, document
- Ensure your notes reflect the continued care needed for the patient
- Meet with your billing team regularly