

Report on Medicare Compliance Volume 33, Number 13. April 08, 2024

QIO: Documentation of Two-Midnight Expectation Is Sinking Claims

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Some variation on the theme of failing to document the two-midnight expectation explains most of the denials for short-stay admissions, according to the results of the second year of reviews by Livanta, the CMS contractor that reviews hospital compliance with the two-midnight rule.^[1]

Livanta, a Beneficiary and Family Centered Care-Quality Improvement Organization (QIO), reviewed 21,510 short-stay claims from hospitals across the country between Nov. 1, 2022, and Oct. 31, 2023. Ninety percent were approved and 10% denied.

Here are the top reasons for the denial:

- “Provider documentation in support of a two-midnight expectation at the time of the admission order is insufficient.”
- “The plan of care does not support a reasonable expectation of two midnights of hospital care.”
- “The need for inpatient care without a two-midnight expectation is not supported by provider documentation regarding the patient’s documented medical needs and risk for an adverse event.”
- “Misclassification of a procedure as being on the Inpatient-Only List for the date the procedure is performed.”

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