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Audits of COVID-19 UIP Claims Are Underway; Evolving HRSA Guidance May Be a Problem

By Nina Youngstrom

Hospitals and other providers should keep an eye out for audits of claims they submitted to the COVID-19 uninsured program (UIP), which was run by the HHS Health Resources and Services Administration (HRSA).

“There’s a lot of HRSA auditing going around right now,” said Brenna Jenny, former CMS chief legal officer.

Hospitals are starting to hear from HRSA that they’ve been selected for an audit of claims they submitted to the UIP, which paid for COVID-19 testing, treatment and vaccinations for people without insurance. An email sent to one hospital informed the hospital it has been selected for a HRSA UIP “assessment.” The reason for the assessment “is to confirm that the money from taxpayers was used properly, according to the goals of the UIP program. Specifically, the scope for the assessment will include a sample of your paid claims to ensure compliance with the UIP Terms and Conditions,” according to the email from HRSA’s Division of Program Integrity in its Provider Relief Bureau.

The compliance officer at the hospital that received the email said the hospital had completed an internal audit of its UIP claims in the fall and returned money to HRSA months before it got the email. “Hopefully, we are in a better position because we already paid a lot of the money back,” he said. “We’ll see how it plays out.”

The hospital’s internal audit found various reasons for the errors. In some cases, coders confirmed the patient had a COVID-19 diagnosis and submitted the claim with all the services provided to the patient, “but only a fraction of the services were focused on the assessment and treatment of COVID,” said the compliance officer, who preferred not to be identified. In other cases, an internal process was effective at removing services unrelated to COVID-19, but they were inadvertently added back to the claim. There were also instances where patients had insurance, “but we didn’t know that at the time.” He added that it will be interesting to see “HRSA’s methodology versus ours. Hopefully, it’s consistent.”

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