

CMS Initiates National SNF 5-Claim Probe and Educate Review beginning June 5

The Centers for Medicare and Medicaid Services (CMS) reissued [transmittal instructions](#) for Medicare Administrative Contractors (MACs) to perform a 5-claim probe and educate medical review on every skilled nursing facility in their jurisdiction. The purpose of this widespread review, which will be implemented in waves over the next year beginning June 5, 2023, is to lower the SNF improper payment rate. Providers should be on the lookout starting in early June for medical records requests related to this program.

The key elements of this project include:

- MACs will select 5 claims from each selected provider unless they are already under review or a very low volume provider.
- MACs will complete 1 round of probe and educate for each selected provider instead of the potential 3 rounds as instructed by the traditional [targeted probe and educate \(TPE\)](#) program.
- Education offered will be individualized based on the claim review errors identified in the probe.

This will be a pre-pay review unless a provider requests a post-pay review for hardship. If the MAC identifies an improper payment, it will adjust the individual claim payment, as appropriate, in addition to providing education – including the explanation for denial or payment adjustment. MACs may prioritize providers with errors in all five claims reviewed for the traditional and more extensive TPE program.

Background and Details

Per CMS, the Comprehensive Error Rate Testing (CERT) program for SNFs [projected an improper payment rate of 15.1 percent in 2022](#), up from 7.79% in 2021. SNF service errors were determined to be the top driver of the overall Medicare Fee-for-Service improper payment rate. CMS states that part of the reason for the significant increase in the improper payment rate may be the change from the Resource Utilization Group (RUG) IV to the PDPM (patient driven payment model) for claims with dates of service on or after October 1, 2019. The primary root cause of SNF errors was found to be missing documentation.

CMS asserts that the 5-claim probe and educate review is an attempt to increase comprehension of correct billing practices under the PDPM by all SNF providers that bill Medicare. The 5-claim probe and educate medical review strategy allows for maximum outreach to all SNFs and offers provider-specific education, as necessary, to prevent future improper payments. If the MAC identifies an improper payment the MAC will adjust/deny the individual claim payment, as appropriate, and provide education.