

# Malnutrition Coding and RAC Update

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# What We Do

The Department of Health Care Policy & Financing administers Health First Colorado (Colorado's Medicaid program), Child Health Plan *Plus* (CHP+) and other health care programs for Coloradans who qualify.



# Our Mission:

Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.



# Why Present This??

- Increasing Scrutiny of Medicaid Regarding Fraud Waste and Abuse
- Malnutrition is an OIG Hot Topic
- Statutory Requirement for Oversight
- Inform Stakeholders of Guidelines
- Ask for Stakeholder Input

# Malnutrition Coding Issues

- 2020 OIG Audit Found Severe Malnutrition Coded Improperly in 86.5% of Cases

Hospitals Overbilled Medicare \$1 Billion by Incorrectly Assigning Severe Malnutrition Diagnosis Codes to Inpatient Hospital Claims

Issued on 07/13/2020 | Posted on 07/13/2020 | Report number: A-03-17-00010

# Malnutrition ICD-10 Codes E40- 46

- E40-43 Severe Malnutrition
- E44- Moderate and Mild
- E45 Retarded Development
- E46 Unspecified Protein-Energy



# Improper Coding

- Over Coding Severe
- Lack of Documentation
- Misapplication of Criteria
- Under coding

# Need to Use Accepted Guidelines to Utilize These Codes



- ASPEN criteria
  - Older
  - 2018 ASPEN Joined Multiple Societies to Publish GLIM Criteria
- GLIM - Global Leadership Initiative on Malnutrition
  - GLIM now most widely accepted



# Glim Criteria Reference

## **GLIM Criteria for the Diagnosis of Malnutrition: A Consensus Report From the Global Clinical Nutrition Community**

Gordon L. Jensen MD, PhD, FASPEN, Tommy Cederholm MD, PhD, M. Isabel T.D. Correia MD, PhD, M. Christina Gonzalez MD, PhD, Ryoji Fukushima MD, PhD ... See all authors

First published: 02 September 2018

<https://doi.org/10.1002/jpen.1440>

Citations: 530

# GLIM Phenotypic Criteria

- Weight Loss%-
  - 5% <6 months or 10%>6 months (Unintended)
- Low BMI-
  - <20 if <70 y.o. or <22 if >70 y.o.
- Reduced Muscle Mass-
  - Finding by objective measures

# GLIM Etiologic Criteria

- Reduced Nutritional Intake
  - <50% of requirement for >1 week or any reduction >2 weeks or Chronic GI disorders with adverse nutrition impact
- Inflammation
  - Chronic Disease, or acute/disease/injury with severe systemic inflammation or socio-economic/ environmental starvation

# Malnutrition Diagnosis Criteria

Physician Documented Diagnosis  
of Malnutrition

and

Presence of at Least One GLIM  
Phenotypic Criteria

And

Presence of at Least One GLIM  
Etiologic Criteria

And

Documentation of significant  
Resource Impact and Treatment  
Plan Should Correspond with the  
Severity of Malnutrition Coded

# GLIM Moderate vs. Severe

Based on Phenotypic Criteria and Requires one  
Phenotypic Criteria That Meets Thresholds

AND

Documentation of Resource Requirements  
Utilized

# Glim Criteria

	Moderate (Stage 1) Malnutrition	Severe (Stage 2) Malnutrition
Weight Loss% (Unintended)	5-10% < 6 Months 10-20% > 6 Months	>10% < 6 Months or >20% > 6 Months
Low BMI	<20 if <70 Years Old Or <22 if >70 Years Old	<18.5 if <70 Years Old Or <20 if >70 Years Old
Reduced Muscle Mass	Mild to Moderate deficit (per validated assessment method)	Severe Deficit (per Validated assessment method)

# Documenting Resource Utilization for Severe Malnutrition

- Mild/moderate malnutrition is treated with simple modalities such as nutrition counseling, specialized diet, 1-2 daily liquid supplements such as Ensure, etc..
- Severe malnutrition is treated with more intensive resources such as a supervised, individualized nutritional plan, more than two daily liquid supplements or utilization of specialized supplements, appetite stimulants, enteral nutrition (such as through a G-tube or nasogastric feeding tube), or total parenteral nutrition (TPN).
- If the treatment plan is not consistent with the diagnosis of severe malnutrition, the diagnosis of severe malnutrition may be considered invalid.



# Validated Muscle Mass Method

Clin Nutrition : 2022 Jun;41(6):1425-1433. doi: 10.1016/j.clnu.2022.02.001. Epub 2022 Apr 19.

Guidance for assessment of the Muscle Mass phenotypic criterion for the Global Leadership initiative on Malnutrition (GLIM) diagnosis of malnutrition

Barazonni et. al.

# GLIM DIAGNOSTIC PROCEDURE for MALNUTRITION

## Muscle mass assessment

### TECHNICAL APPROACHES

BIA

DXA

CT

US

Any available with appropriate expertise and reference values?

NO

### CLINICAL APPROACHES

#### ANTHROPOMETRY

Calf circumference

Mid-upper arm circumference

#### PHYSICAL EXAMINATION

YES

Muscle mass

# RAC Update

HCPF and HMS (RAC audit vendor) have spent considerable time and resources vetting the audit process with a goal of creating an efficient, fair, and user-friendly process that fulfills the statutory requirement of oversight of Health First Colorado.

The new process has many checks and balances that start with vetting audit scenarios and continue until the audit is completed

# Audit Update

Expectation 1<sup>st</sup> Automated Audit Will Occur in November 2025

- EMT Trips with no Corresponding Medical Claims
- Professional Duplicates

Expectation 1<sup>st</sup> Complex Audit Will Occur With Request for Medical Records in December 2025

- DRG