July 2025

Cotiviti – Region 5

Recovery Audit Contractor

Provider Outreach

COTIVITI

Agenda

- Cotiviti At A Glance
- Recovery Audit Contract
- Approved Review Topics
- Additional Documentation Request Letter and Informational Letter
- Discussion Process
- Provider Portal
- Recovery Audit Process and Reminders

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

At A Glance

COTIVITI GOV SERVICES

About Us

- Cotiviti is a leading data and analytics company, offering software and technology-enabled services that leverage unparalleled clinical and financial datasets to deliver deep insights into the performance of the healthcare system.

Why Cotiviti

- Our organizational scale enhances the breadth and depth of our experience, enabling Cotiviti to serve both commercial healthcare and Government markets with unmatched expertise.

Our Vision

- Through advanced technology, data analytics, and specialized expertise we improve the healthcare system.

Our Mission

- We enable a high-quality and viable healthcare system.

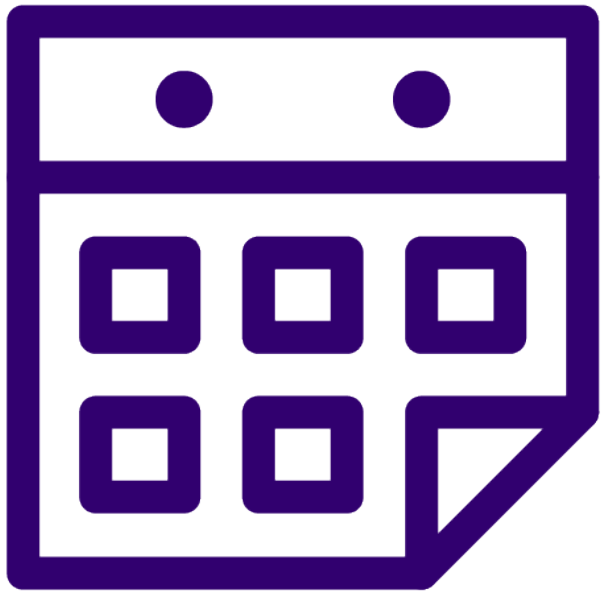
What We Do

- Cotiviti focuses on improving outcomes and reducing costs for healthcare.
- We support the financial strength of commercial health plans and government payers (CMS, VA and DHA) as they migrate to a value-based system.

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

New Contract Timeline

- April 28, 2025-CMS awarded Cotiviti GOV Services LLC the Recovery Audit Contractor (RAC) contracts for Regions 3, 4 and 5
- Region 5 is Nationwide for Durable Medical Equipment, Prosthetic Devices, Prosthetics, Orthotics, & Supplies (DMEPOS), Home Health Agencies (HHAs), and Hospice
- Region 5 covers Durable Medical Equipment (DME) Medicare Administrative Contractor (MAC) jurisdictions
  - Noridian – JA, JD
  - CGS – JB, JC
- Region 5 Home Health & Hospice (HH+H) MAC jurisdictions
  - CGS – J15
  - NGS – J6, JK
  - Palmetto – JM



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Medicare Fee for Service RAC Regions

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

The Medicare Fee for Service Recovery Audit Program's Mission

To identify and correct Medicare improper payments through the efficient detection and collection of overpayments made on claims of health care services provided to Medicare beneficiaries, and the identification of underpayments to providers so that the CMS can implement actions that will prevent future improper payments in all 50 states. [1]

[1] https://www.cms.gov/data-research/monitoring-programs/medicare-fee-service-compliance-programs/medicare-fee-service-recovery-audit-program

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Recovery Auditor Contractor (RAC)

- **The RAC performs post-payment complex and automated reviews**
  - Automated reviews: performed via data mining
  - Complex reviews: require an appropriately licensed person to review the medical record
- **If an improper payment is identified**
  - Cotiviti will provide a detailed description of the Medicare policy or rule that was violated
- **If no improper payment is found**
  - The provider will receive a no findings letter

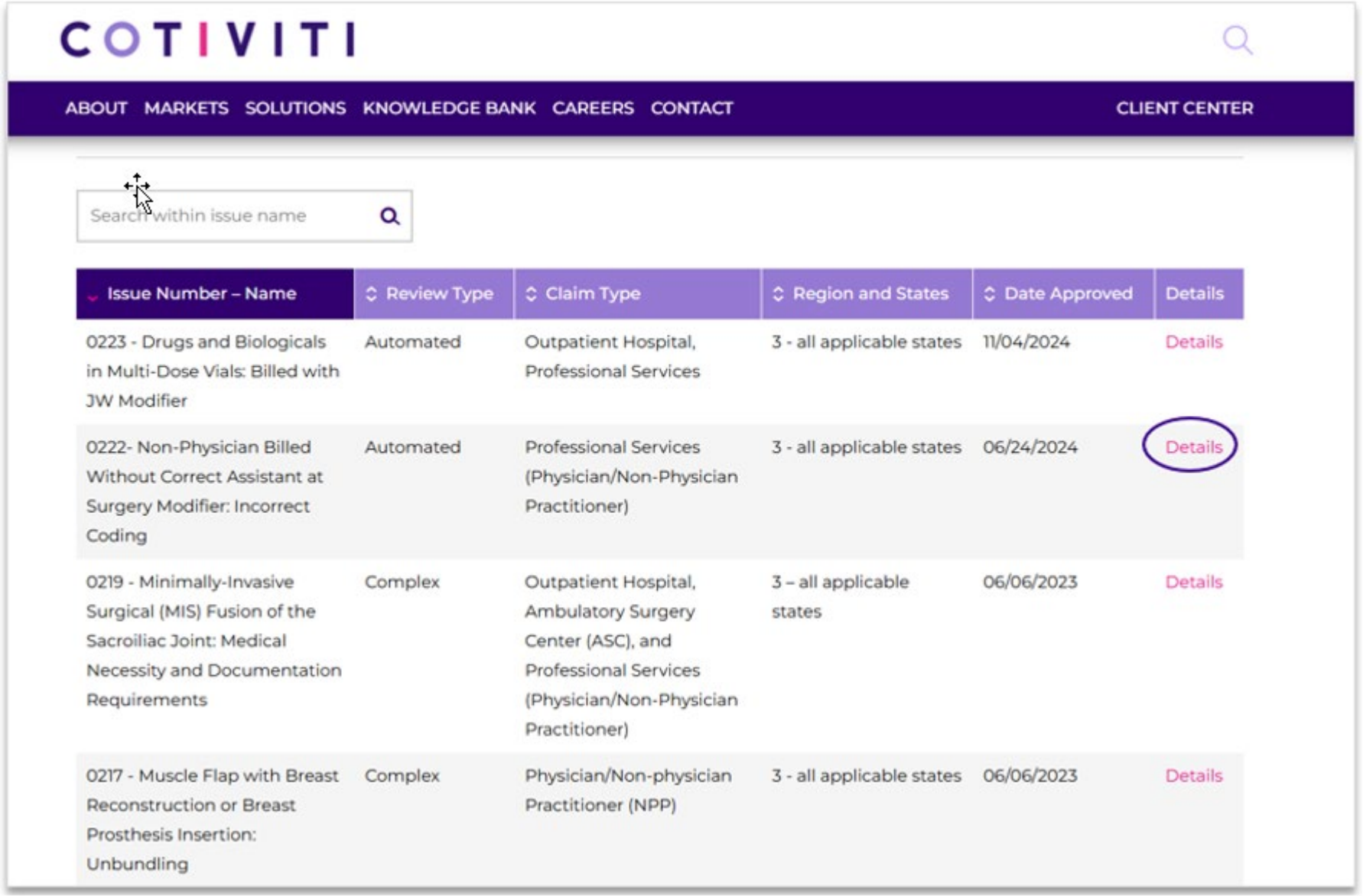
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

What does the RAC review?

Approved Review Topics

COTIVITI

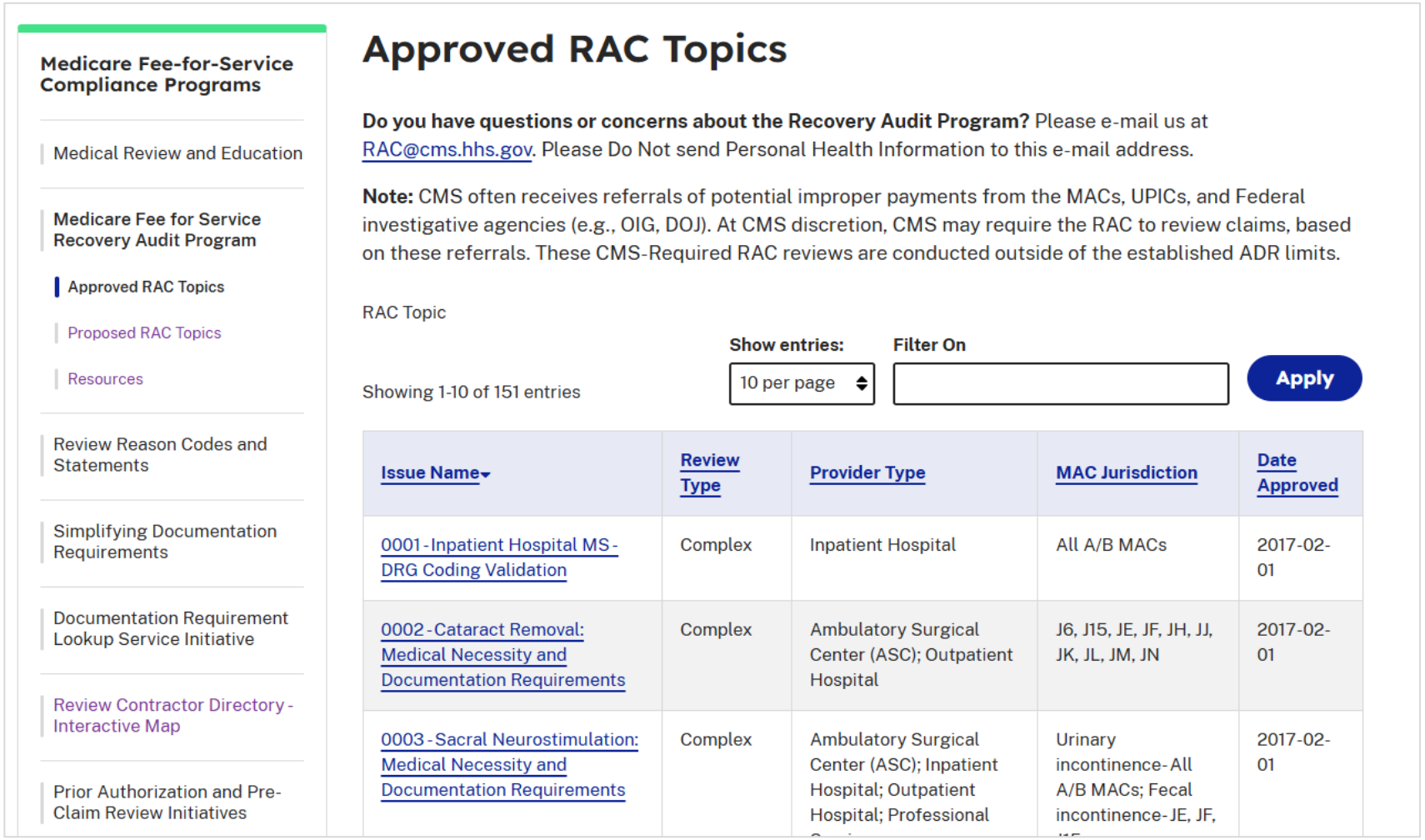
Approved Review Topics-www.cotiviti.com/RAC



Issue Number – Name	Review Type	Claim Type	Region and States	Date Approved	Details
0223 - Drugs and Biologicals in Multi-Dose Vials: Billed with JW Modifier	Automated	Outpatient Hospital, Professional Services	3 - all applicable states	11/04/2024	Details
0222- Non-Physician Billed Without Correct Assistant at Surgery Modifier: Incorrect Coding	Automated	Professional Services (Physician/Non-Physician Practitioner)	3 - all applicable states	06/24/2024	Details
0219 - Minimally-Invasive Surgical (MIS) Fusion of the Sacroiliac Joint: Medical Necessity and Documentation Requirements	Complex	Outpatient Hospital, Ambulatory Surgery Center (ASC), and Professional Services (Physician/Non-Physician Practitioner)	3 – all applicable states	06/06/2023	Details
0217 - Muscle Flap with Breast Reconstruction or Breast Prosthesis Insertion: Unbundling	Complex	Physician/Non-physician Practitioner (NPP)	3 - all applicable states	06/06/2023	Details

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Approved Review Topics-CMS.gov



Medicare Fee-for-Service Compliance Programs

- Medical Review and Education
- **Medicare Fee for Service Recovery Audit Program**
  - Approved RAC Topics
  - Proposed RAC Topics
  - Resources
- Review Reason Codes and Statements
- Simplifying Documentation Requirements
- Documentation Requirement Lookup Service Initiative
- Review Contractor Directory - Interactive Map
- Prior Authorization and Pre-Claim Review Initiatives

Approved RAC Topics

Do you have questions or concerns about the Recovery Audit Program? Please e-mail us at RAC@cms.hhs.gov. Please Do Not send Personal Health Information to this e-mail address.

Note: CMS often receives referrals of potential improper payments from the MACs, UPICs, and Federal investigative agencies (e.g., OIG, DOJ). At CMS discretion, CMS may require the RAC to review claims, based on these referrals. These CMS-Required RAC reviews are conducted outside of the established ADR limits.

RAC Topic

Showing 1-10 of 151 entries

Show entries: 10 per page

Filter On

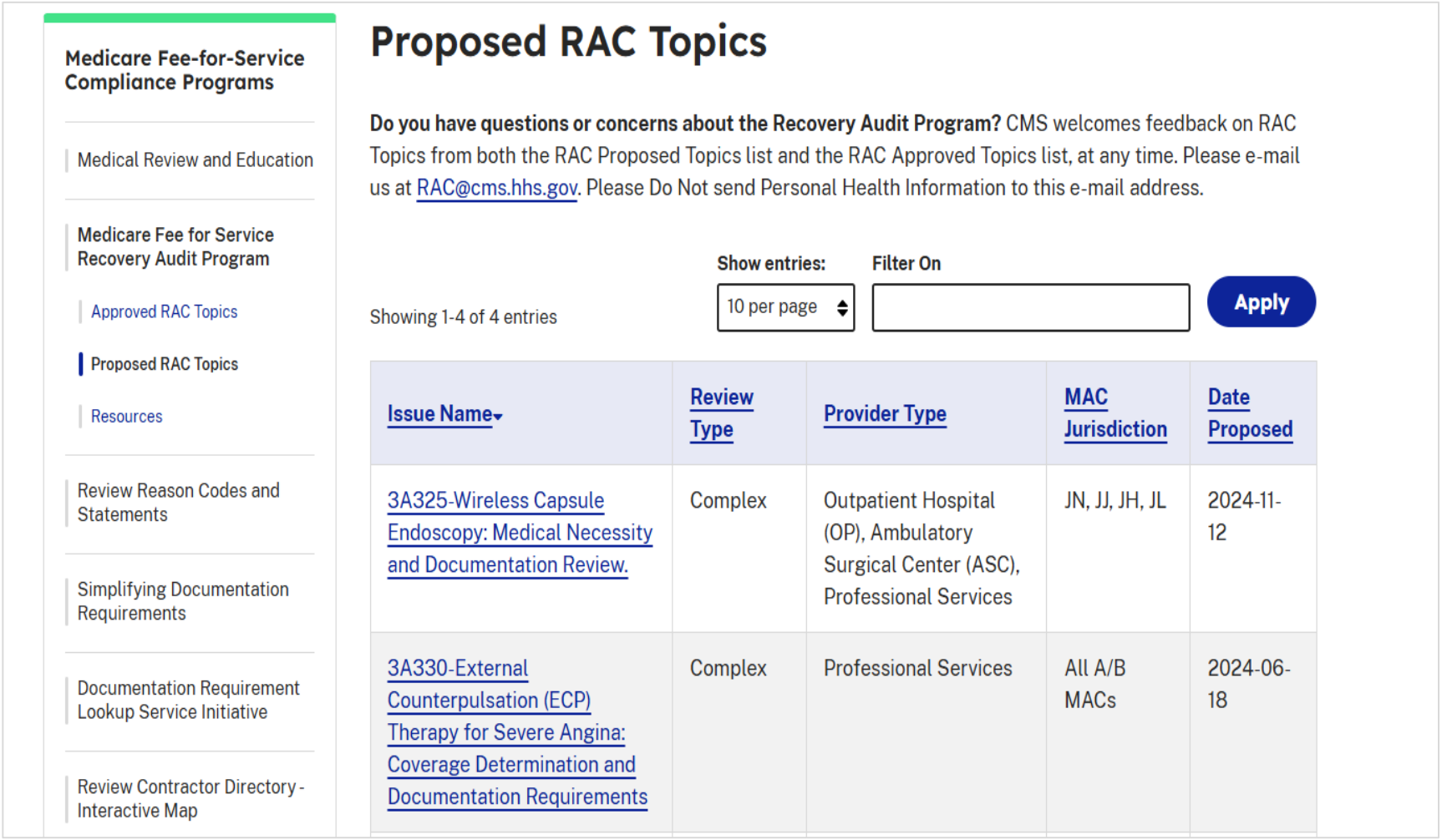
Apply

Issue Name	Review Type	Provider Type	MAC Jurisdiction	Date Approved
0001 - Inpatient Hospital MS - DRG Coding Validation	Complex	Inpatient Hospital	All A/B MACs	2017-02-01
0002 - Cataract Removal: Medical Necessity and Documentation Requirements	Complex	Ambulatory Surgical Center (ASC); Outpatient Hospital	J6, J15, JE, JF, JH, JJ, JK, JL, JM, JN	2017-02-01
0003 - Sacral Neurostimulation: Medical Necessity and Documentation Requirements	Complex	Ambulatory Surgical Center (ASC); Inpatient Hospital; Outpatient Hospital; Professional	Urinary incontinence - All A/B MACs; Fecal incontinence - JE, JF,	2017-02-01

[1] https://www.cms.gov/data-research/monitoring-programs/medicare-fee-service-compliance-programs/medicare-fee-service-recovery-audit-program

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Proposed Review Topics-CMS.gov



Medicare Fee-for-Service Compliance Programs

- Medical Review and Education
- Medicare Fee for Service Recovery Audit Program
  - Approved RAC Topics
  - Proposed RAC Topics
  - Resources
- Review Reason Codes and Statements
- Simplifying Documentation Requirements
- Documentation Requirement Lookup Service Initiative
- Review Contractor Directory - Interactive Map

Proposed RAC Topics

Do you have questions or concerns about the Recovery Audit Program? CMS welcomes feedback on RAC Topics from both the RAC Proposed Topics list and the RAC Approved Topics list, at any time. Please e-mail us at RAC@cms.hhs.gov. Please Do Not send Personal Health Information to this e-mail address.

Showing 1-4 of 4 entries

Show entries: 10 per page

Filter On

Apply

Issue Name	Review Type	Provider Type	MAC Jurisdiction	Date Proposed
3A325-Wireless Capsule Endoscopy: Medical Necessity and Documentation Review.	Complex	Outpatient Hospital (OP), Ambulatory Surgical Center (ASC), Professional Services	JN, JJ, JH, JL	2024-11-12
3A330-External Counterpulsation (ECP) Therapy for Severe Angina: Coverage Determination and Documentation Requirements	Complex	Professional Services	All A/B MACs	2024-06-18

[1] https://www.cms.gov/data-research/monitoring-programs/medicare-fee-service-compliance-programs/medicare-fee-service-recovery-audit-program

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

How do I know if I have been selected for review?

Additional Documentation Request Letter and Informational Letter

COTIVITI

Additional Documentation Request (ADR) Letter Sample (Complex Review)

COTIVITI

Recovery Auditor for CMS

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

August 5, 2024

Reference ID:

Attention: Provider Name

Address: Provider Address

Your Response is Required By:

September 19, 2024

NPI:
PTAN:
Provider Phone:
Provider Fax:

Request Type & Purpose: Additional Documentation Required and Request for Medical Records

Dear Medicare Provider,

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Complex Review Life Cycle

- An ADR Letter is sent to the provider requesting the medical record(s)
- The provider has 45 days from the date of the letter to submit the documentation. Extensions are available by calling or emailing Provider Relations
- Reimbursement for medical records
  - 12 cents per page, plus postage, up to $15 per record for mail, fax, or CD/DVD, and 12 cents per page plus a $2 transaction fee, up to $27 per record for electronic submissions (esMD)
- Once the medical record(s) is received, the RAC has 30 days to review the documentation and issue a Review Results Letter or No Findings Letter to the provider
- If the provider disagrees with the findings, the provider has 30 days from the date of the Review Results Letter, to submit a discussion request and additional documentation. Extensions are available by calling or sending an email to Provider Relations
- Starting on Day 31, the findings may be sent to the MAC for adjustment if a discussion request has not been received

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Informational Results Letter Sample (Automated Review)

COTIVITI

CMS CENTERS FOR MEDICARE & MEDICAID SERVICES

Recovery Auditor for CMS

January 4, 2024

Informational Results Letter – Time Sensitive

Provider Name
Provider Address
City, State ZIP

Re: Provider Name – Provider Number

The Centers for Medicare and Medicaid Services (CMS) has retained Cotiviti Healthcare to carry out the Recovery Audit Contracting (RAC) program in RAC Region 3. The RAC program is mandated by Congress and tasked, under the Social Security Act (the Act) § 1893 (h) (1) and (3), with reducing improper payment of Medicare claims nationwide. Improper payments include overpayments and underpayments. Improper payments may occur because of incorrect coding, lack of sufficient documentation or no documentation, use of an outdated fee schedule or billing for services that do not meet Medicare's coverage and/or medical necessity criteria, etc.

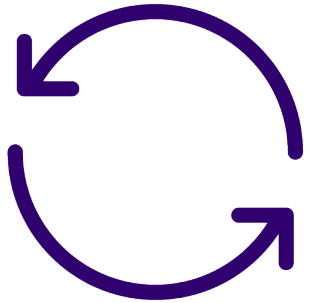
This Informational Results Letter serves as notification of improper payment as required by 42 CFR § 405.982 and § 1893 (f) (7) of the Act. Detailed information regarding each claim and the findings identified during the review are attached to this letter.

Cotiviti found that some of the services you submitted were not reasonable and necessary as required by § 1861 of the Act, did not meet the conditions of payment for services as required by § 1814 of the Act, did not meet the procedure for payment as required by § 1835 of the Act, or did not meet the Medicare coverage requirements as required in § 1862 of the Act. The results of our analysis constituted reopening under § 1869 (b) (1) (G) of the Act, 42 Code of Federal Regulations (CFR) 405.980 (a) (1), Chapter 3, § 3.5.1 of the Medicare Program Integrity Manual, and Chapter 34, § 10.6.1 of the Medicare Claims Processing Manual. Our good cause to reopen the claim, as required by 42 CFR §§ 405.980 (b) (2) and 405.986, was due to the results of data analysis.

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Automated Review Life Cycle

- The Informational Results Letter is sent to the provider with the results of the review(s). The medical record is not required for the initial review.
- The results are identified through data mining which utilizes Medicare regulations, policies and billing guidelines to identify improper payments.
- If the provider disagrees with the findings, the provider has 30 days from the date of the Informational Results Letter, to submit a discussion request with any documentation. Extensions are available by calling or sending an email to Provider Relations.
- Starting on Day 31, the findings may be sent to the MAC for adjustment if a discussion request has not been received.



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

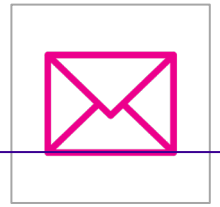
How to submit documentation

Portal Direct Upload

Via Cotiviti's Secure Provider Portal

esMD

Information for submitting records via esMD can be found on CMS' website



Postal Mail

Images on CD/DVD

Paper

Passwords should be emailed to Provider Relations. RAC5info@cotiviti.com

Fax

Fax: 203-529-2995

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

What if I disagree with the results?

Discussion Process

COTIVITI

Discussion Period Requests

What?

- When a provider disagrees with the results of the initial review, they may submit a Discussion Request which provides a second review.

When?

- The provider has 30 days from the date of the Review Results Letter or Informational Letter to submit a Discussion Request (extensions are available). Cotiviti has 30 days from receipt of the request to provide a written response.

How?

- Submit the discussion form with any additional documentation to be reviewed. Send the documents via mail, fax or the Portal.

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Two Types of Discussion Period Requests

Discussion

- The form and any additional documentation received are reviewed by a different auditor and a response is sent to the provider

Peer to Peer (Physician to Physician)*

- An opportunity for the provider's physician to discuss the review findings with the Contractor Medical Director (CMD) and Review Staff. The provider's physician is to be employed by the provider and not a consultant. After the meeting, a written response is sent to the provider

*Indicate the Peer-to-Peer request and provide contact information for scheduling on the Discussion Request Form or via the Portal discussion submission

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Discussion Form (not required for Portal upload)

COTIVITI

Recovery Auditor for CMS

CMS

Discussion Request Form

Description

A provider has 30 days from the date of the Review Results Letter for a Complex review, or within 30 days from the date of the Cotiviti Provider Portal notification for an Automated review, to submit this request. If you require an extension, please contact us for consideration. During this period, or during our review of your request, Cotiviti will not submit any adjustments to your payer.

Additionally, if the physician, or a physician employed by the provider, not a consultant, would like to request to speak with Cotiviti's Medical Director, please (1) click the box to the right; (2) follow the instructions to complete and submit this form. Cotiviti will contact you to set up the physician-to-physician Discussion.

For more details on Discussion Requests and/or the RAC process, please contact Cotiviti Provider Service at 866-360-2507 or go to www.CMS.gov and search for Medicare Fee for Service Recovery Audit Program. You may also contact CMS directly at RAC@cms.hhs.gov.

Instructions

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Discussion Period Requests-Items of Note

- If the original finding is overturned, the MAC will not be notified.
- If the original finding is upheld, the findings will then be sent to the MAC, who will process the adjustment.
- If we received a discussion request after the findings have been sent to the MAC, we are not allowed to review. The provider will receive notification of the late discussion.
- If the provider disagrees with the results of the discussion, they may file a Redetermination with the MAC. Directions on how to file a redetermination is included on the Demand Letter which is sent by the MAC.

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Where do I find the portal?

www.cotiviti.com/rac

COTIVITI

www.cotiviti.com/RAC

Provider Portal Login

Your NPI number is now required to log into the Provider Portal.

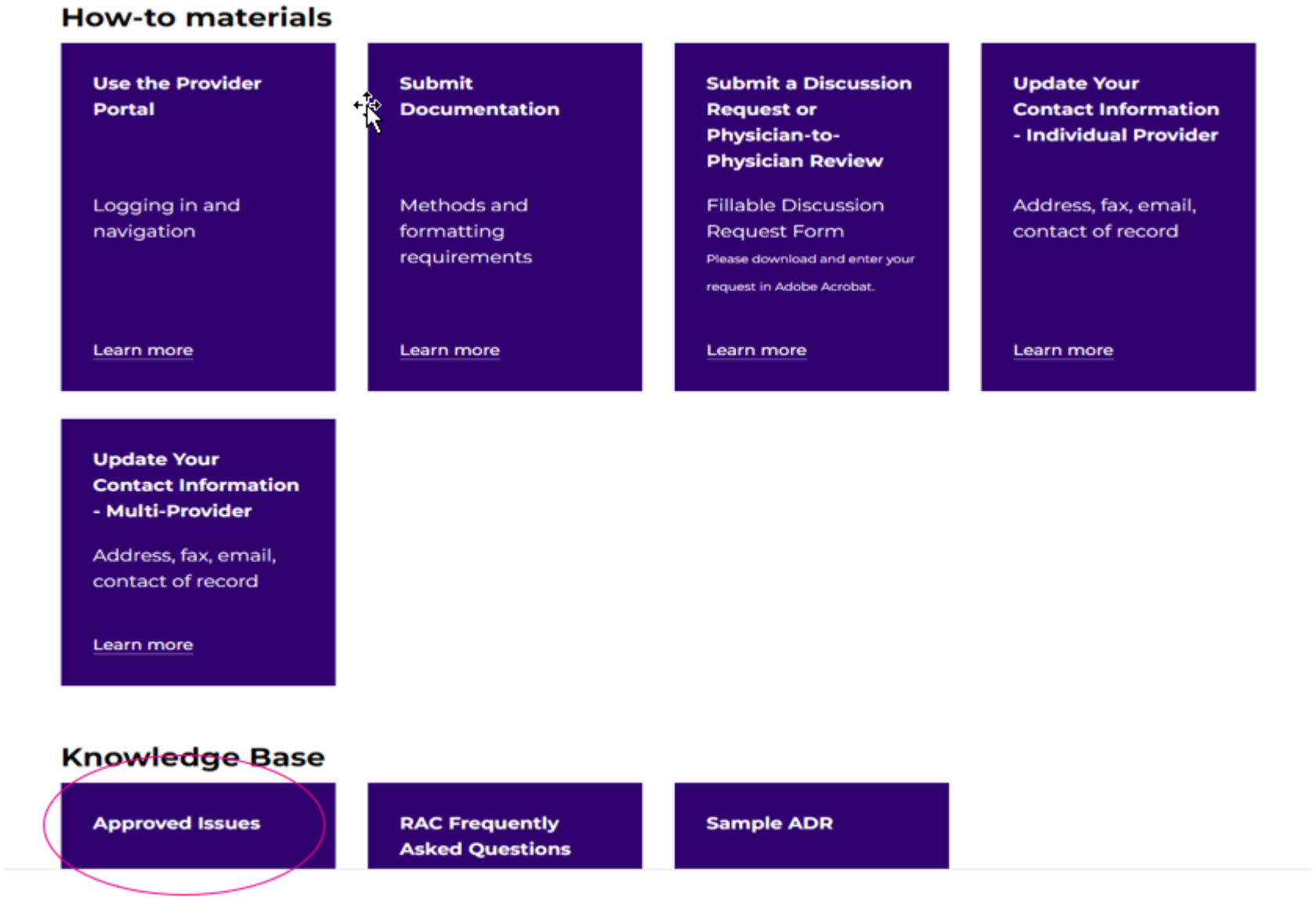
With the provider portal, you can:

- Upload discussions and correspondence
- Download, view and print RAC letters
- Upload medical records
- Check your claim review status 24/7
- Update contact information
- Export data

COTIVITI

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

www.cotiviti.com/RAC



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

What can I see and do in the Provider Portal?

COTIVITI

www.cotiviti.com/RAC

Provider Portal Login

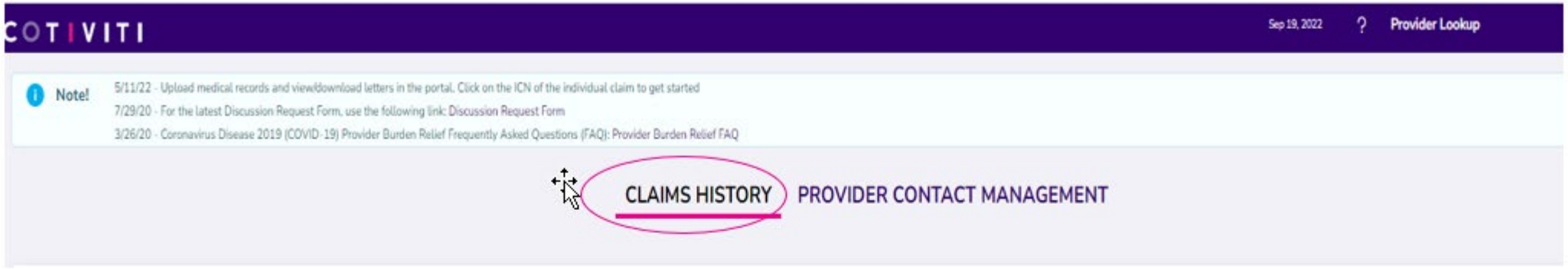
Your NPI number is now required to log into the Provider Portal.

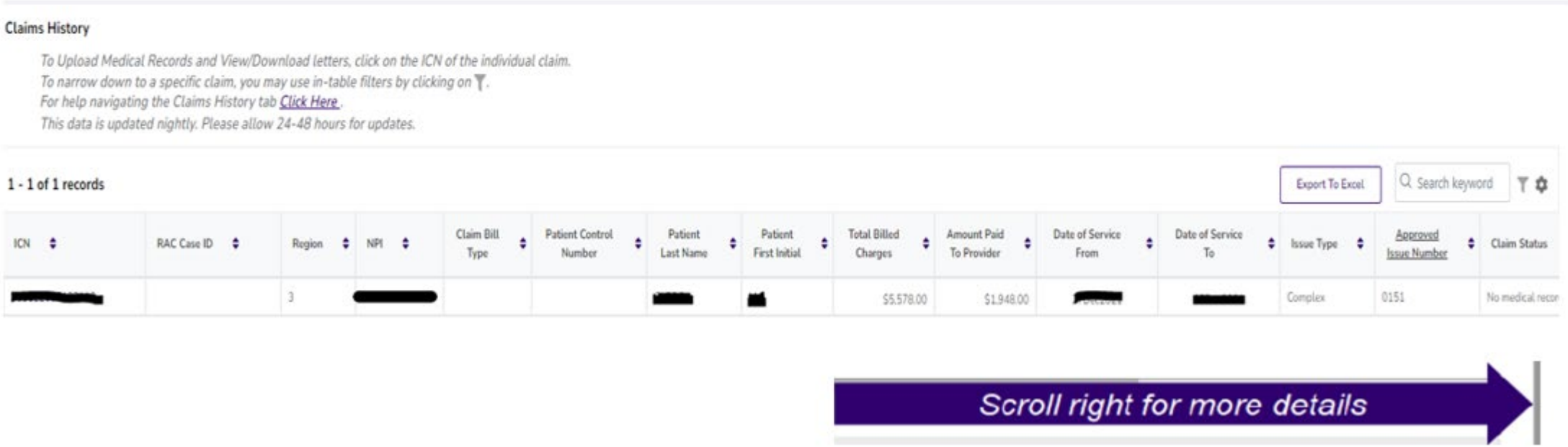
With the provider portal, you can:

- Upload discussions and correspondence
- Download, view and print RAC letters
- Upload medical records
- Check your claim review status 24/7
- Update contact information
- Export data

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

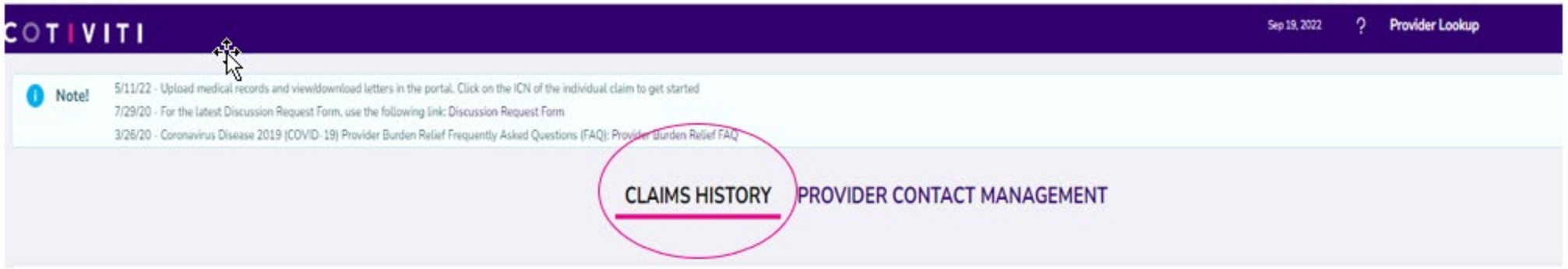
Provider Portal-Claims History Tab

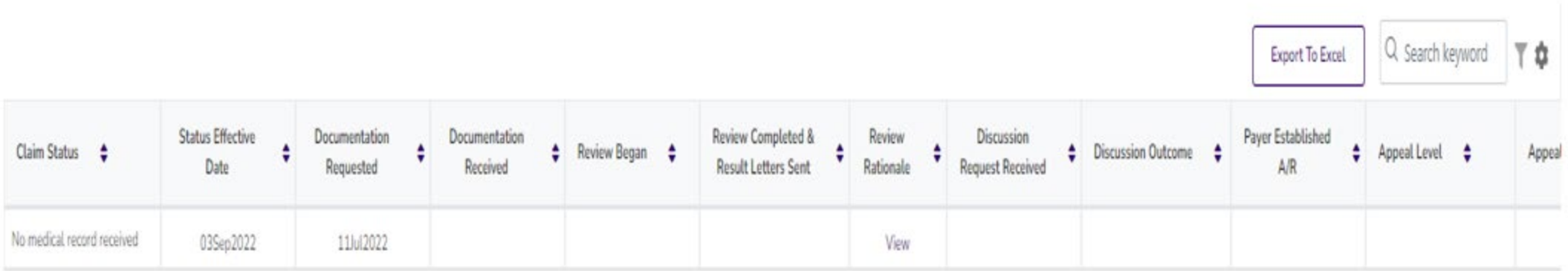




© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

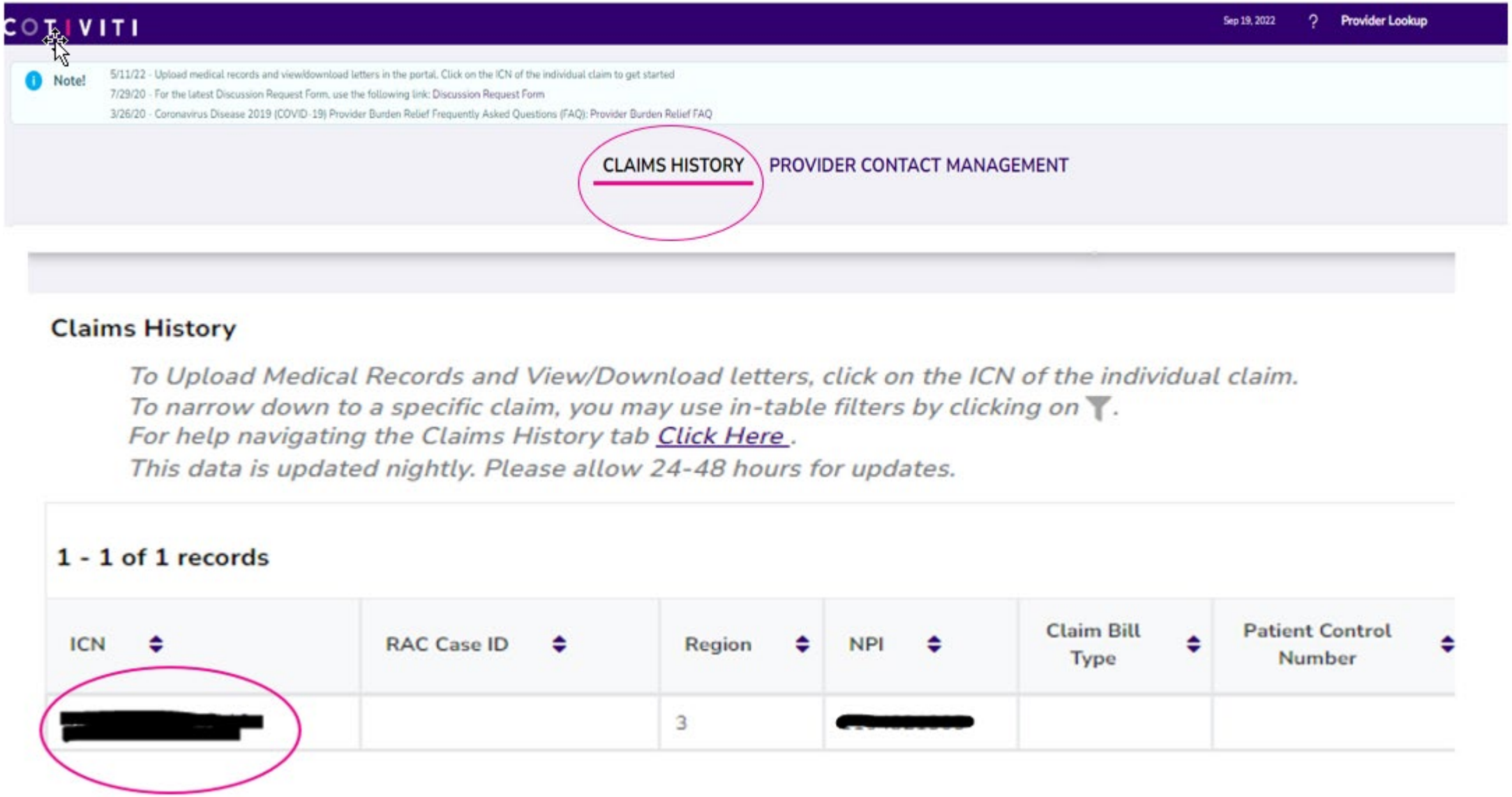
Provider Portal





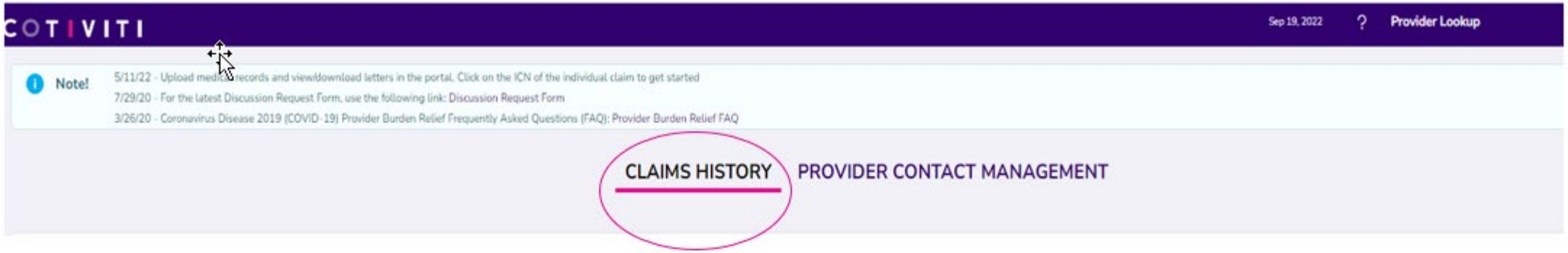
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

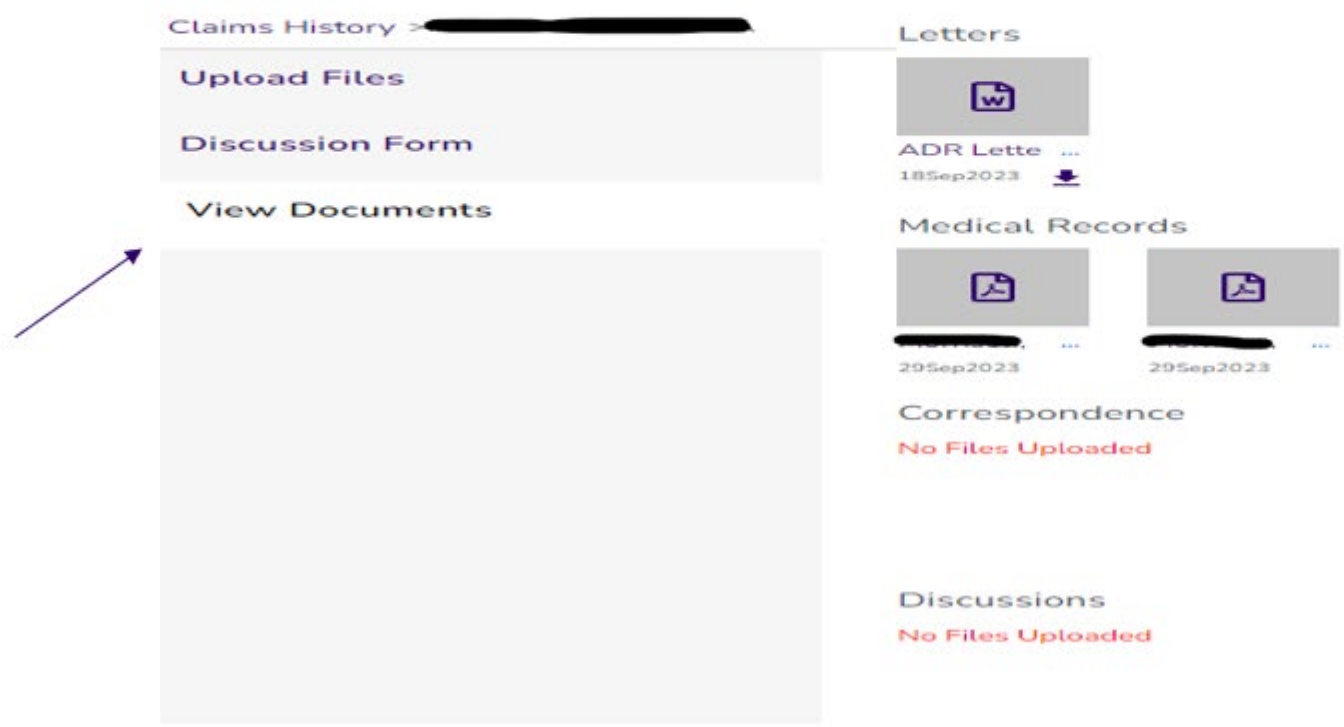
Provider Portal-View/Download Letters



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

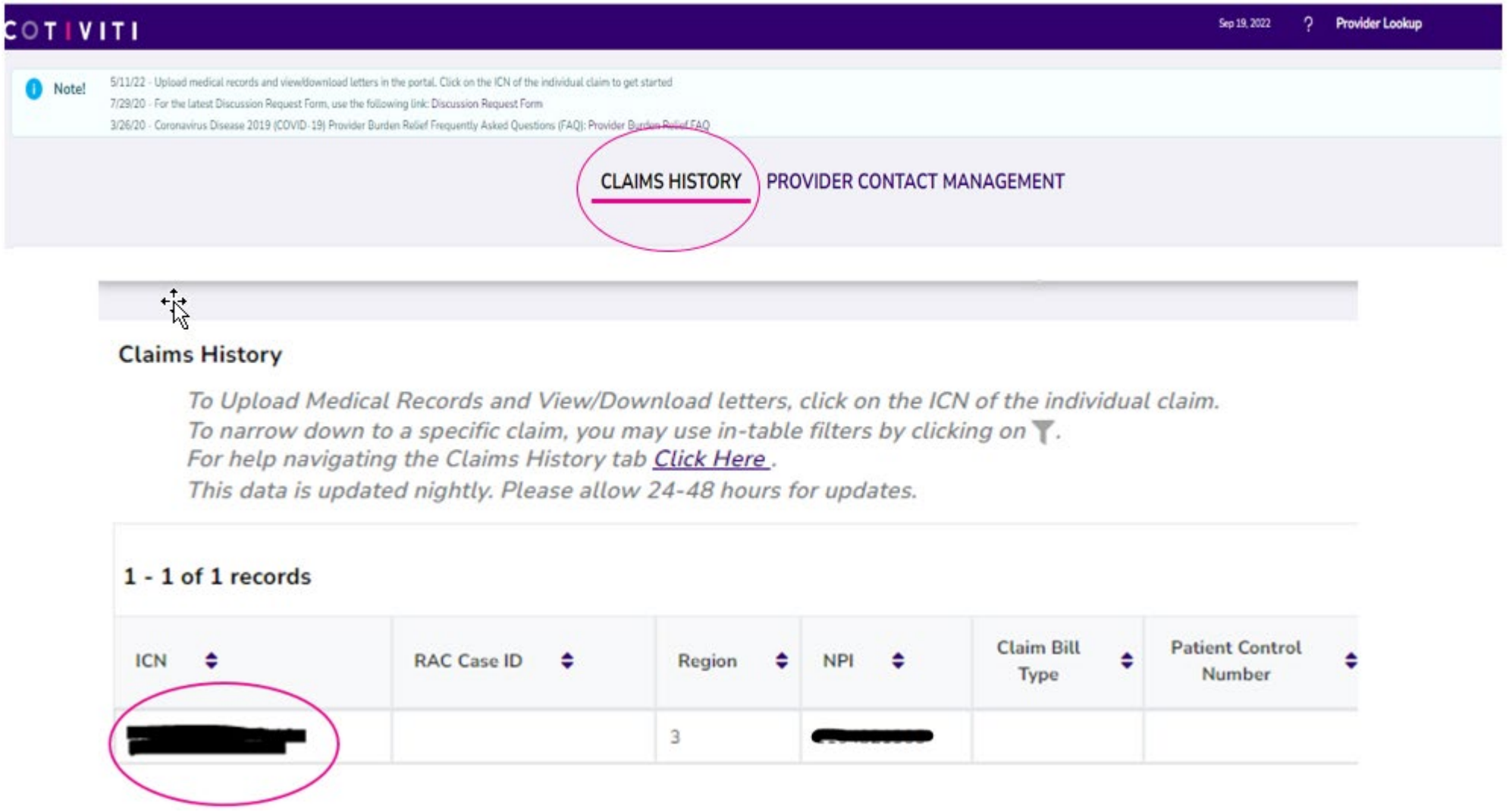
Provider Portal-View/Download Letters (cont'd)





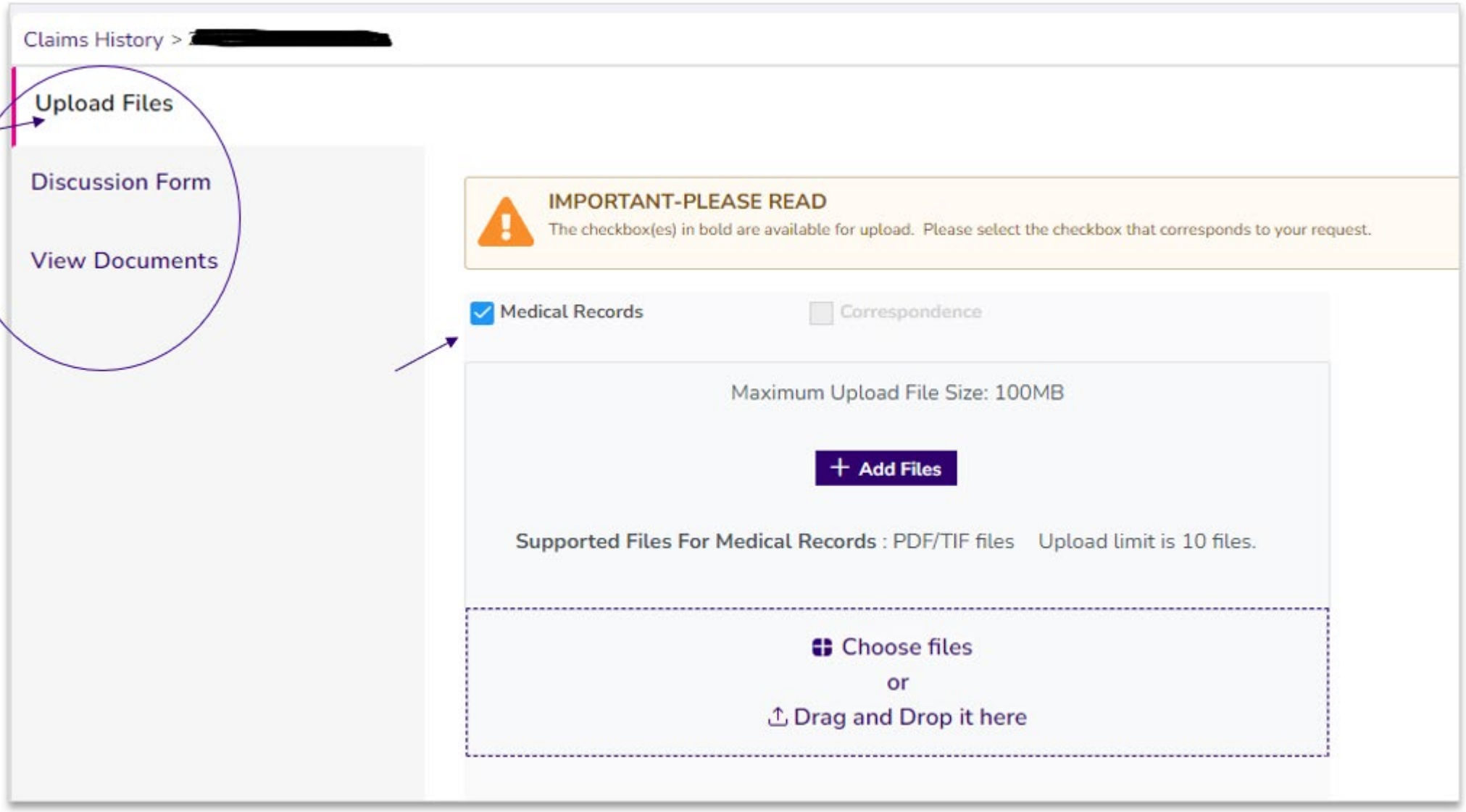
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Provider Portal-Medical Record, Discussion, Peer-to-Peer and Correspondence Upload



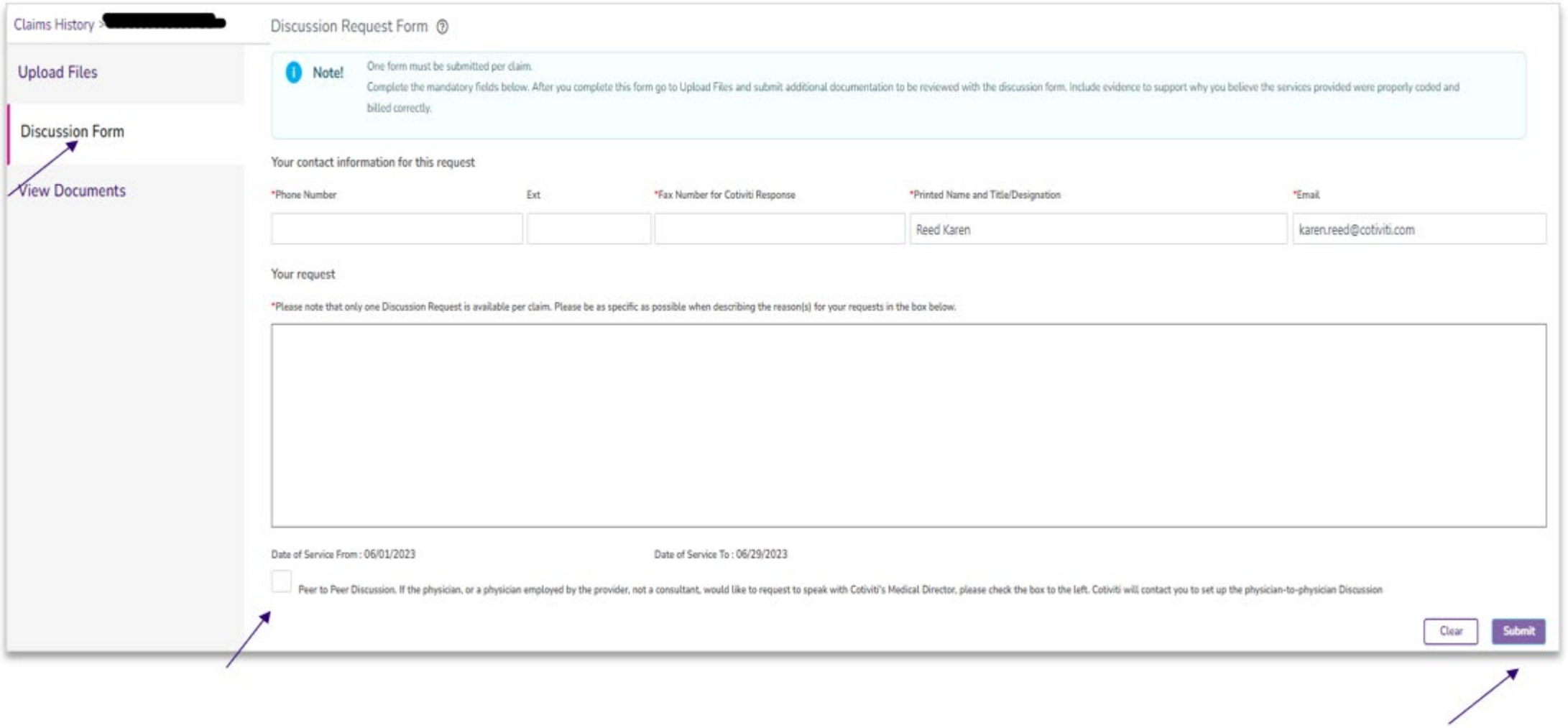
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Provider Portal-Medical Record Upload



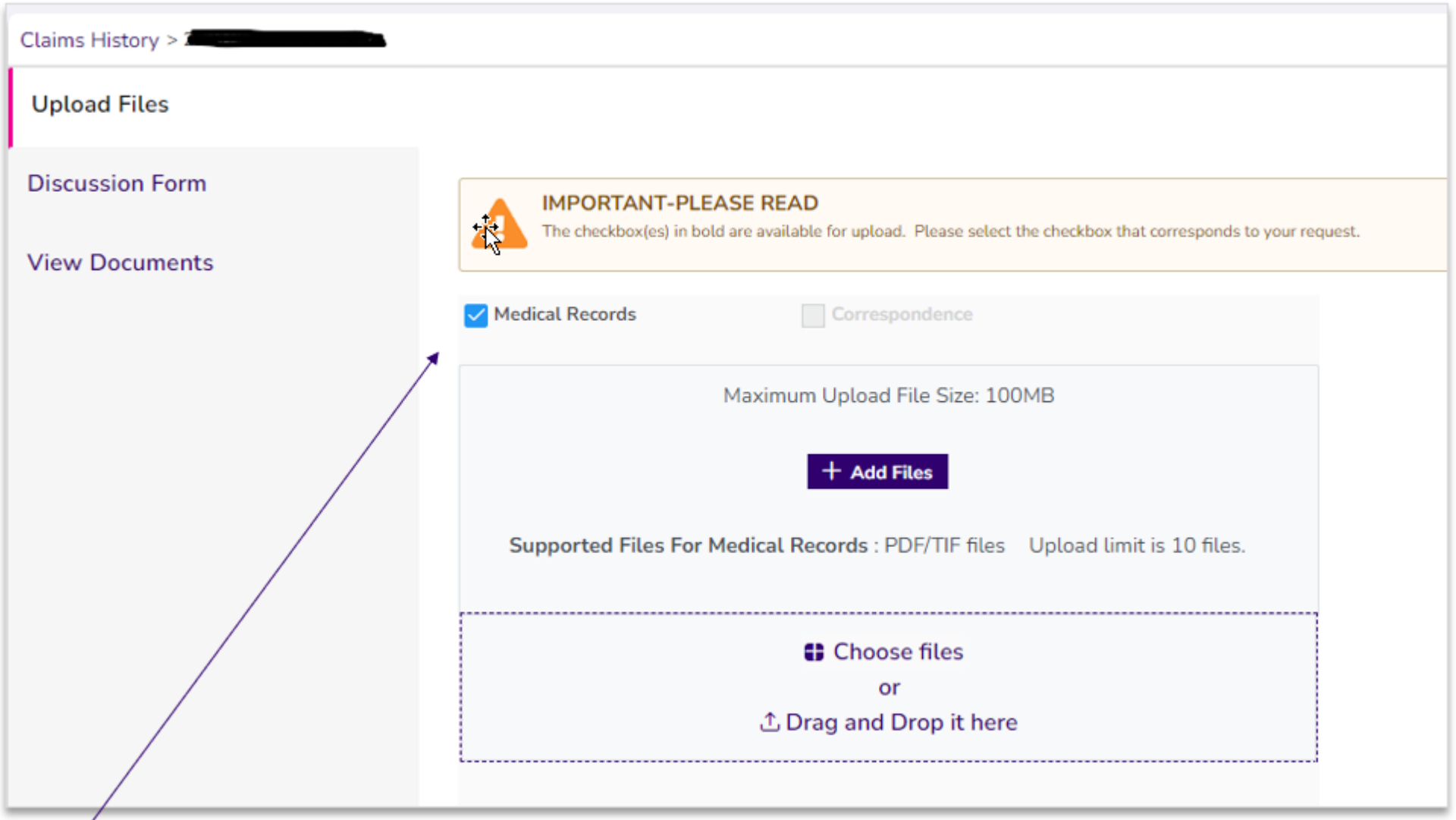
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Provider Portal-Discussion/Peer to Peer Upload



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

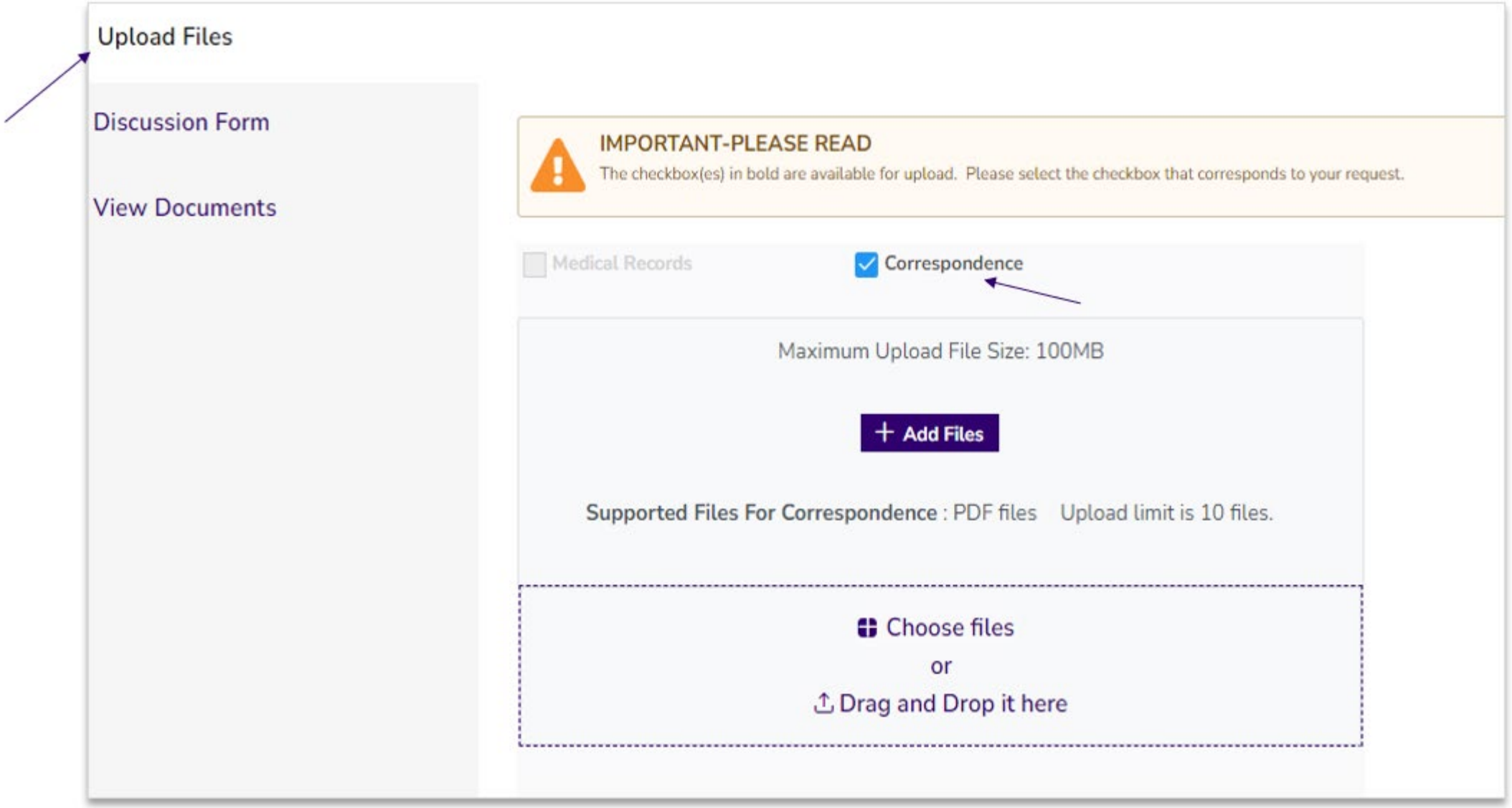
Provider Portal-Discussion/Peer to Peer Upload (cont'd)



Upload discussion/peer to peer documents with the discussion checkbox.

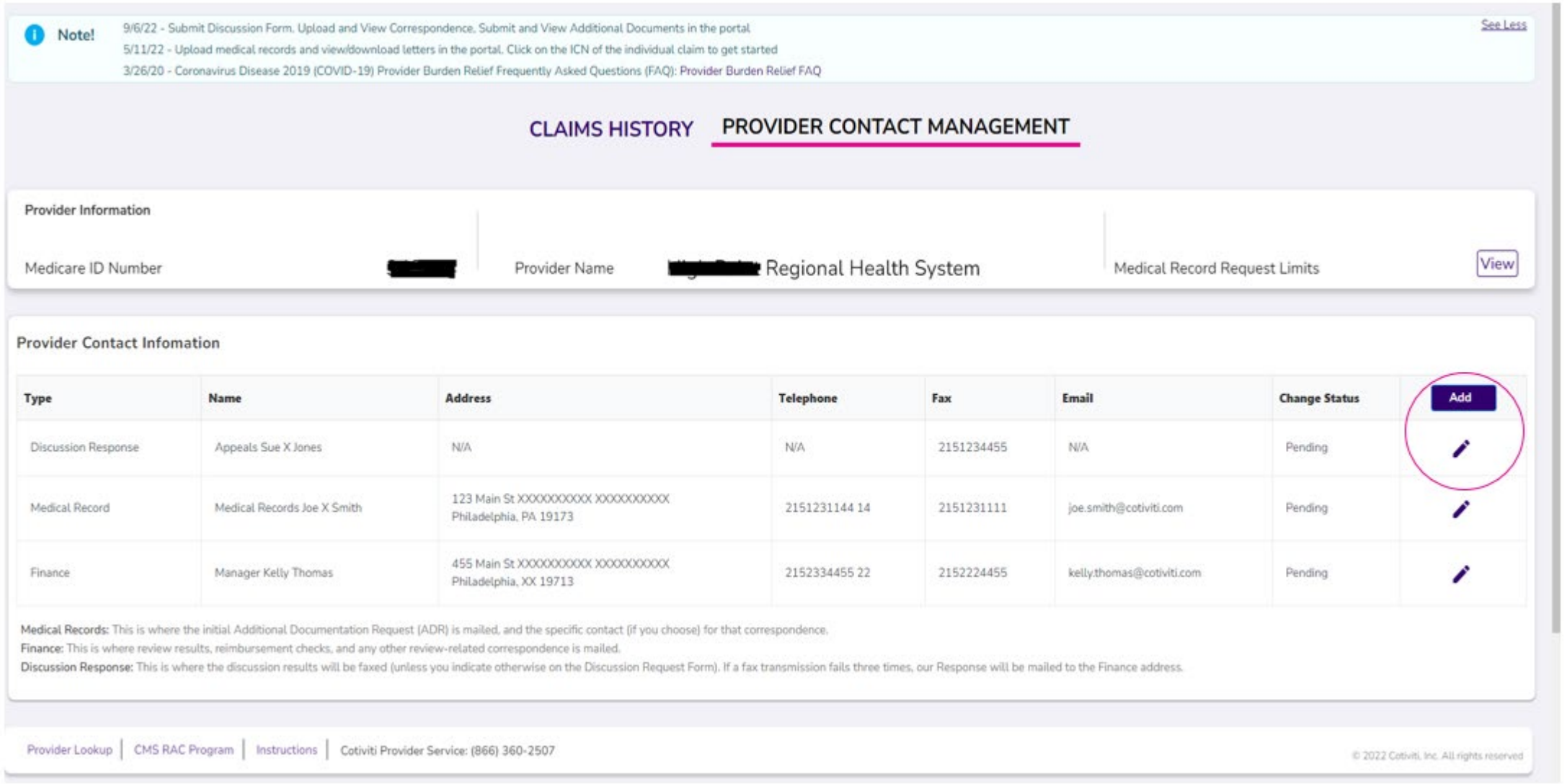
© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Provider Portal-Correspondence Upload



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Provider Portal-Provider Contact Management



© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

RAC Process Highlights and Reminders

COTIVITI

What can I do to prepare for a RAC Review?

- Access Cotiviti's Provider Portal at www.cotiviti.com/rac and confirm your Contact Information.
- Stay up-to-date on new CMS Approved Review Topics and regularly visit the CMS page for proposed RAC Reviews
- Monitor the RAC Landing Page for Announcements and Updates
- Respond timely to ADR requests and include all documentation to support billed services
- Become familiar with the Discussion Request process

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Region 5 Contact Information

Toll Free Number (8am to 4:30pm in each applicable time zone)
833-510-9690

Fax Number
203-529-2995

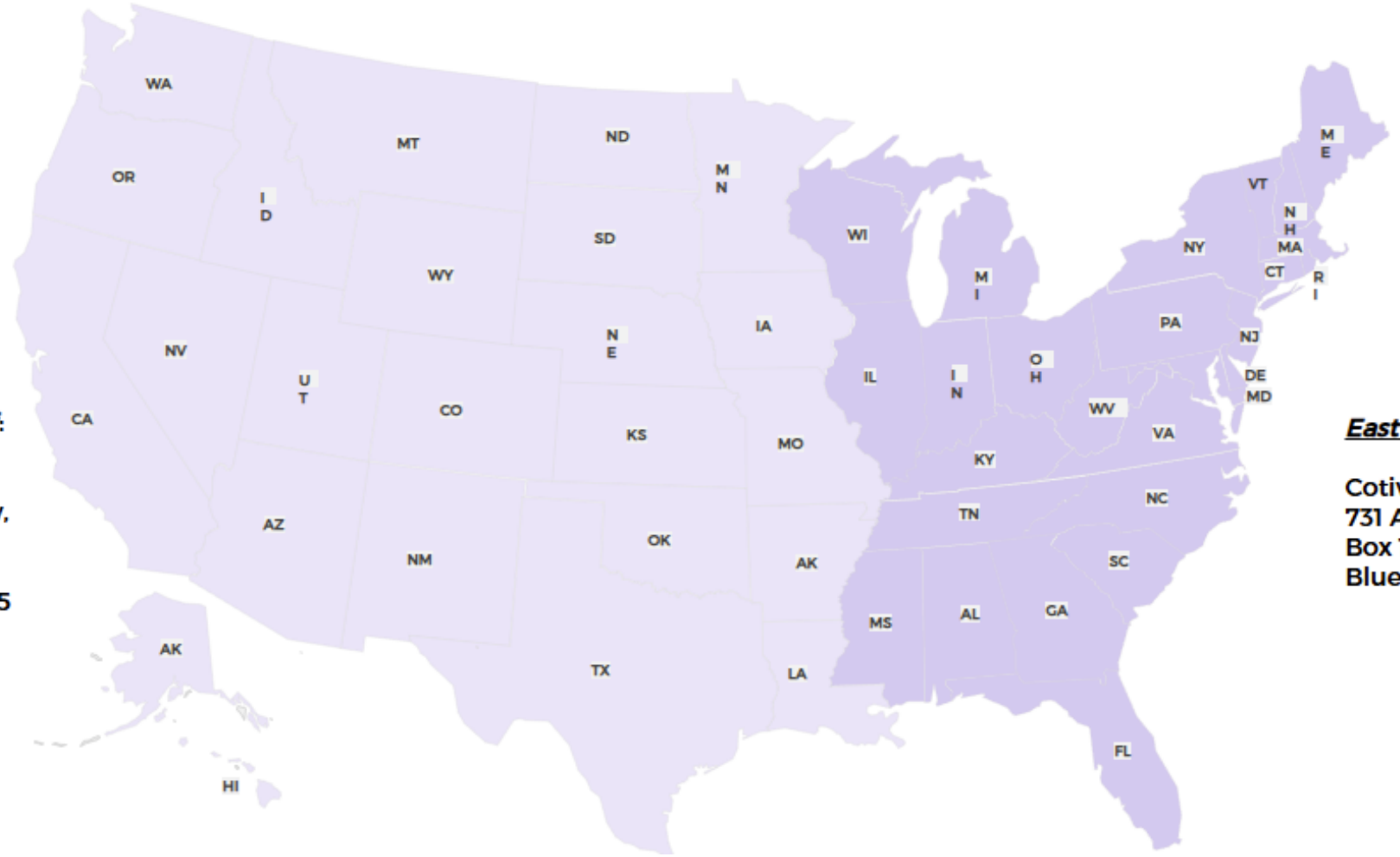
RAC Email Address
rac5info@cotiviti.com

Cotiviti RAC website
www.Cotiviti.com/rac

CMS
https://www.cms.gov/data-research/monitoring-programs/medicare-fee-service-compliance-programs/medicare-fee-service-recovery-audit-program

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Cotiviti's Addresses



West of the Mississippi:

Cotiviti – CMS RAC
10701 River Front Pkwy.
Suite 110
Box 12005
South Jordan UT 84095

East of the Mississippi:

Cotiviti – CMS RAC
731 Arbor Way, Suite 150
Box 12005
Blue Bell PA 19422

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.

Thank You

COTIVITI

Disclaimer

This information is provided “as is” without any expressed or implied warranty. While all information in this document is believed to be correct at the time of writing, this document is for informative purposes only and does not purport to provide legal advice.

All processes and guidelines are undergoing continuous improvement and modification by Cotiviti and the Centers for Medicare & Medicaid Services (CMS).

© 2025 Cotiviti, Inc. All rights reserved. All proprietary information shall remain the sole and exclusive property of Cotiviti, Inc.