NEW! PEPPER Medicare Part A Clinical Review (1455P) and PEPPER Medicare Part A Financial Review (1456P)

- Use to ensure completion of necessary clinical items for traditional Medicare A beneficiaries in a skilled stay
- Provides space to record Target Areas and Action Plan to address areas of concern on the facility’s PEPPER report
- Internal auditing/monitoring/education tool
- White paper, black ink
- 5-hole top punched

Have You Viewed Your PEPPER Reports Yet?

The TMF Health Quality Institute reported in July that only 49% of skilled nursing facilities have accessed their Program for Evaluating Payment Patterns Electronic Report (PEPPER). Are you one of the 51% that has yet to review their PEPPER report?

“The Government Accountability Office has designated Medicare as a program at high risk for fraud, waste and abuse. Payments to skilled nursing facilities (SNFs) have been identified as vulnerable to abuse. In 2012 the Office of Inspector General (OIG) found that approximately 25% of SNF claims were billed in error. The Office of Inspector General encourages SNFs to develop and implement a compliance program to protect their operations from fraud and abuse. Beginning in 2013, SNFs are required to have a compliance program. As part of a compliance program, a SNF should conduct regular audits to ensure services provided are necessary and that charges for Medicare services are correctly documented and billed. The PEPPER report can help guide the SNF’s auditing and monitoring activities.”

PEPPER is an annual report that summarizes an individual facility’s Medicare A (UB-04) claims in areas that may be at risk for improper payment. Your facility’s claim information is compared to other skilled facilities across your state, MAC and the nation.

The current PEPPER Target Areas are:

- Therapy RUGS with High ADLs
- Non-therapy RUGS with High ADLs
- Change of Therapy Assessment
- Ultrahigh therapy RUGS
- Therapy
- 90+Day Episodes of Care

Briggs Healthcare® has developed two internal auditing, monitoring, and educational tools to help skilled facilities comply with the directive to ensure that services provided to traditional Medicare A beneficiaries are necessary, documented and billed correctly:

- PEPPER Medicare Part A Clinical Review
- PEPPER Medicare Part B Financial Review

You should be starting your internal audit NOW! An attorney that spoke on the subject of PEPPER reports at the 2014 LeadingAge conference in Nashville provided these tips to the audience:

- “PEPPER is a roadmap from the government to help you identify potentially vulnerable or improper payments… use this roadmap!
- Incorporate the risk areas as part of your CQI, QAPI, or compliance programs
- Implement or adjust the Medicare Part A Triple Check Process accordingly”

In addition, Briggs Healthcare® has identified the Target Area items on our comprehensive Minimum Data Set 3.0 form to remind clinicians of PEPPER monitoring.

For more information regarding PEPPER including a User’s Guide for Skilled Facilities and registering to obtain your PEPPER reports as they are released, click here.