



OIG Announces Audits of Medicaid Inpatient Hospital Claims for Severe Malnutrition

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The Office of the Inspector General (OIG) under the Department of Health and Human Services [announced](#) it is conducting audits of Medicaid inpatient hospital claims with severe malnutrition. While the OIG is not sharing additional details since the audits are in progress, we believe this action builds on their previous audits to determine hospital compliance with Medicare billing requirements when assigning severe malnutrition diagnosis codes.

Our multiorganizational malnutrition diagnosis, documentation, and coding task force including the American Society for Parenteral and Enteral Nutrition (ASPEN), the Academy of Nutrition and Dietetics (Academy), the American Society for Clinical Documentation Integrity Specialists (ACDIS) and the American Society of Nutrition (ASN) continues its efforts with the CMS Provider Compliance Division (CPI) to advocate for the use of appropriate criteria by auditors in reviewing severe malnutrition claims. We are requesting a meeting with Noridian, the Supplemental Medical Review Contractor, who is conducting supplemental audits of Medicare claims. We will also be conducting another round of outreach to commercial payers for similar purposes.

We recognize the prospect of an audit is anxiety-producing. We continue to encourage hospitals to ensure a sound process is in place considering these new audits, as well as the supplementary review audits of Medicare claims that are underway. Our message to CMS, commercial payers, and practitioners remains the same. These include:

- A multidisciplinary team approach for care
- Application of a uniform set of criteria
- Collaboration between dietitians, providers, clinical documentation integrity specialists, and coding specialists to ensure continuity of clinical care, documentation, and coding

- Documentation of the condition with appropriate specificity along with the criteria used for the diagnosis.

If your facility undergoes an audit, the task force would like to learn more about your experience. If you can share information pertaining to an audit, please contact Ainsley Malone at ainsleym@nutritioncare.org Thank you.

Further updates will be provided as new information is identified. We encourage you to access the multitude of resources on malnutrition diagnosis, documentation, and coding available through our associations.