

Documentation Requirements for Organ Acquisition Audits (From the November 1, 2005 Mutual Medicare Newsletter)

The Medicare program reimburses organ acquisition services furnished by certified transplant centers at reasonable cost. Because of this, hospitals certified as transplant centers are expected to maintain adequate cost data. Below is a non-exhaustive list of documents that we expect a hospital claiming organ acquisition costs to have available at the time of audit. All documents should be contemporaneous with the period under review.

- A copy of the CMS certification of the transplant center(s)
- A roster of the employees that provided services in the transplant center(s)
- A payroll register for each employee that provided services in the transplant center(s)
- Job descriptions for all positions that provided services in the transplant center(s)
- Time studies that reflect pre and post transplant time and that meet the requirements of CMS Pub. 15-1 §2313.2E for all employees that provided services in the transplant center(s)
- Time records for employees that provide services in more than one transplant center and that serve as a basis for assigning the employees' compensation in those centers
- A floor plan that clearly indicates the space occupied by the transplant center(s)
- Support for the Worksheet B-1 statistics used to allocate general service costs to the organ acquisition cost center(s)
- Patient records that support the number of patient days and ancillary charges reflected on Worksheet D-6, Part I
- Invoices for organs purchased from other hospitals or organ procurement organizations (OPO)
- Patient records that support the number of organs excised at the hospital
- Patient records that support the number of organs transplanted into both Medicare and non-Medicare beneficiaries
- Documentation to support the number of organs sold to military and veterans' hospitals and the number of organs sold outside the United States

Pre-transplant time is comprised of those services furnished to living donors and recipients prior to the time of admission to the hospital for the transplant and the time associated with acquiring and transporting an organ from another hospital or OPO. Pre-transplant time also includes medically necessary postoperative inpatient services furnished to a live donor for complications resulting from the organ donation.

Regulation References:

42 CFR Part 121 and 42 CFR Section 412.100 CMS Publication 15-1, Section 2182, 2307, 2313.2E and Sections 2770 through 2775 CMS Publication 15-2, Chapter 36, Sections 3604, 3605.1, 3610, 3611, 3613, 3614, 3615, 3617, and 3625