

Risk Adjustment Coding Corner

Neighborhood News – July 2025

Ostomies

According to the United Ostomy Associates of America, there are approximately 725,000 to 1 million people in the U.S. living with an ostomy. Ostomies impact medical care and may be associated with complications. Types of Ostomies include tracheostomy, gastrostomy, colostomy, ileostomy, and urostomy.

- Ostomies are often documented in the surgical history. Since some are reversible or temporary, it's important to clearly note whether the ostomy is still present.
- Complications such as bleeding from the stoma, infection, prolapse, stomal stenosis, or obstruction should be documented.
- Tracheostomies may require ventilator support. A common complication is accidental removal of the tracheostomy tube.
- Ileostomy and colostomy status are often mistakenly used interchangeably, but they are distinct procedures with separate ICD-10-CM codes.
- ICD-10-CM includes codes for encounters related to the care of artificial openings. These can include revision or closure of the opening, catheter removal, and ostomy cleansing or maintenance.

RADV Audits

- Risk Adjustment Data Validation (RADV) audits are conducted to ensure that diagnoses submitted for risk adjustment are supported by documentation in the enrollees' medical records. If diagnoses are not properly supported, health plans may be subject to overpayment collection.
- There are two types of RADV audits:

HHS RADV	CMS (MA) RADV
<ul style="list-style-type: none"> • Conducted annually, by the Department of Health and Human Services for the Commercial (Affordable Care Act) population. <ul style="list-style-type: none"> ○ Up to 200 members may be selected per audit. ○ Audits run from May through January each year. 	<ul style="list-style-type: none"> • Conducted by the Centers for Medicare and Medicaid Services (CMS) for Medicare Advantage Plans. <ul style="list-style-type: none"> ○ Previously random, but a press release from May 2025 announced expanded audit efforts. ○ CMS will accelerate audits for payment years 2018-2024 and increase the number of records reviewed per plan. (35 to 200 records per benefit year will be audited, depending on plan size.) ○ CMS aims to complete these audits by early 2026.

- For providers, the main impact is related to record retrieval. During audits, you may see increased activity in your offices with NHPRI personnel pulling charts for RADV.
- While this may feel routine, as Neighborhood nurses often conduct on-site retrospective record retrieval throughout the year, it's key to remember that this process helps ensure coders can capture conditions not billed on claims.
- You may also receive signature attestation requests when records lack a valid or legible signature.
- All audits, including RADV, are crucial for ensuring regulatory compliance and accurately capturing members' health status. With your partnership, we've achieved validation rates within normal ranges for all seven years of HHS RADV audits. While details on CMS RADV remain limited, increased audit volume and overlapping timelines are expected. ***We sincerely appreciate your continued cooperation and flexibility as we navigate these changes together.***

References

- [Ostomy related complications](#) (NIH)
- [Tracheostomy](#) (John Hopkins Medicine)
- [Complications of Ostomy Surgery of the Bowel](#) (NIDDK)
- [What is an Ostomy](#) (United Ostomy Associates of America)
- [ICD-10-CM](#) (CDC)
- [CMS RADV Overview](#)
- [CMS RADV Press Release](#)

We want to hear from you!

Neighborhood Health Plan of Rhode Island invites your contributions for future risk adjustment content. What would you like to learn more about? Please send any suggestions, feedback, or questions to

RiskAdjustment@nhpri.org.