



Issue Brief

Texas Health and Human Services Office of Inspector General

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Trends in the use of vitamin injections in nursing facilities

The Texas Health and Human Services Office of Inspector General (OIG) is seeing an increase in cases with medically unnecessary use of vitamin injections in Texas long-term care facilities.

This practice involves outside entities coming to facilities and giving residents intravenous fluids containing vitamins and other medications. Evaluations done by OIG nurse reviewers have found that some facilities are having these injections administered during time periods when Medicaid payment rates (known as Resource Utilization Group or RUG rates) are evaluated, which increases the amount of payments allowed over an extended period.

The OIG has concerns about this practice in several areas, among them quality of patient care, adherence to Medicaid requirements, and a practice known as upcoding in which a facility gets a higher payment by providing or billing for unnecessary care.

The patient care issues seen by the OIG include:

- Administering the infusion too quickly, which could cause adverse effects on the client, or when the medical record indicated the client should not receive the infusion due to a medical condition or other medications.
- Lack of medical records indicating the medical need for the vitamin infusion or the administration of the infusion is inconsistent with the identified need for the infusion (generally dehydration, malnutrition or wound care).
- Incomplete medical record documentation on the administration of the infusion or progress of the client (for example, no detailed orders, progress notes, supporting labs or appropriate diagnosis).
- Orders for the infusions made by a physician who has not seen the client and is not the attending physician for the facility. The absence of progress notes or supporting documentation by facility clinical staff indicate the potential for a lack of coordination of care between the outside entity and the facility clinical staff.

Nurse reviewers are also finding instances of facilities scheduling this procedure during regular RUG rate review periods, when records are evaluated over a specified period that establishes payment amounts made over an extended time frame. Reviewers are finding some providers may be increasing the RUG rate by conducting potentially unnecessary procedures that are paid at a higher rate during the review period. The provider then gets paid more over the extended post-review time than they should.

Vitamin infusions can be appropriate care for nursing home residents when determined to be medically necessary and in alignment with care plans coordinated by facility staff. Facilities must ensure that medical necessity and the administration of the infusions is appropriate and well documented.

The OIG Provider Investigations unit is reviewing cases and initiating investigations when evidence indicates potential wrongdoing. To report suspected fraud, waste or abuse call the OIG Fraud Hotline, 800-436-6184, or use the online reporting form at www.ReportTexasFraud.com.
