

The Supplementary Appendices for the

Medicare Fee-for-Service 2010 Improper Payment Report

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Appendix A – List of Acronyms

AC Affiliated Contractor

AMA American Medical Association
BBA Balanced Budget Act of 1997

BETOS Berenson-Eggers Type of Service

CAFM Contractor Administrative-Budget and Financial Management System

CDAC Clinical Data Abstraction CenterCERT Comprehensive Error Rate TestingCMN Certificate of Medical Necessity

CMS Centers for Medicare & Medicaid Services

CPT Current Procedural Terminology

CTRDS CERT Tracking and Reporting Database and System

CY Calendar Year

DARN Dollars at Risk of No DocumentationDHHS Department of Health and Human Services

DRG Diagnosis Related GroupDME Durable Medical Equipment

DMERC Durable Medical Equipment Regional Carrier

E&M Evaluation and ManagementEMR Electronic Medical RecordsESRD End Stage Renal Disease

FFS Fee-for-Service
FI Fiscal Intermediary

FY Fiscal Year

GPRA Government Performance & Results Act of 1993
HCPCS Healthcare Common Procedure Coding System

HHA Home Health Agency

HICN Health Insurance Claim Number

HIPAA Health Insurance Portability and Accountability Act of 1996

HI Hospital Insurance

HPMP Hospital Payment Monitoring Program

ICD-9-CM International Classification of Diseases (10th Revision) Clinical Modification

IPIA Improper Payment Information Act
LCD Local Coverage Determination

LI Line Item

LPET Local Provider Education and Training
MAC Medicare Administrative Contractor

MMA Medicare Modernization Act

MFS Medicare Fee Schedule
MIP Medicare Integrity Program

MSP Medicare Secondary Payer
NCH National Claims History

OIG Office of the Inspector General

OPPS Outpatient Prospective Payment System

PPS Prospective Payment System
PSC Program Safeguard Contractor
QIO Quality Improvement Organization

RAC Recovery Audit Contractors

RAP Request for Anticipated Payment

RHC Rural Health Clinic

RHHI Regional Home Health Intermediary

RTP Return to Provider

SNF Skilled Nursing Facility

Appendix B: Projected Improper Payments and Type of Error by Type of Service for each Claim Type

Tables B1 through B4 displays the paid claims error rates for each type of service by type of error. This series of tables is sorted in descending order by projected improper payments. All estimates in this table are based on a minimum of 30 lines in the sample.

Table B1: Top 20 Service Types with Highest Improper Payments: Part B

| Table B1: 1 op 2 | o Bervice Typ | CS WILL | Inghest Im | лорегта | • | pe of Error | | |
|--|-----------------------------------|---------------|-------------------------------|-------------------------|---------------------------------------|---------------------------------------|----------------------|-------|
| Service Type Billed to Carriers (BETOS codes) | Projected Improper Payments | Error Rate | 95% Confidence Interval | No Docume ntation | Insufficien t Document ation | Medically Unnecessa ry Services | Incorrec t Coding | Other |
| All Other Codes | \$2,596,449,264 | 9.3% | 7.8% - 10.7% | 2.0% | 76.7% | 16.7% | 4.0% | 0.7% |
| Office visits – | | | | | | | | |
| established | \$1,475,533,109 | 12.3% | 11.4% - 13.2% | 1.5% | 54.4% | 0.5% | 42.8% | 0.8% |
| Hospital visit – subsequent | \$1,099,101,902 | 20.5% | 17.0% - 23.9% | 1.4% | 62.8% | 0.0% | 35.8% | 0.0% |
| Minor procedures - other (Medicare fee schedule) | \$686,424,679 | 18.1% | 14.9% - 21.2% | 1.7% | 82.8% | 12.4% | 2.0% | 1.1% |
| Consultations | \$670,743,182 | 23.3% | 20.9% - 25.8% | 0.3% | 21.6% | 0.0% | 78.0% | 0.1% |
| Lab tests - other (non- Medicare fee schedule) | \$561,377,980 | 19.9% | 14.7% - 25.1% | 1.2% | 66.4% | 31.8% | 0.3% | 0.3% |
| Hospital visit - initial | \$481,856,709 | 28.2% | 24.1% - 32.4% | 0.6% | 38.3% | 0.0% | 60.8% | 0.2% |
| Other drugs | \$436,214,485 | 8.4% | 3.4% - 13.5% | 0.1% | 63.1% | 30.9% | 5.9% | 0.0% |
| Nursing home visit | \$346,166,960 | 21.7% | 18.0% - 25.3% | 3.8% | 51.6% | 0.4% | 44.1% | 0.2% |
| Office visits - new | \$292,486,069 | 24.0% | 20.4% - 27.5% | 0.7% | 30.5% | 2.1% | 64.5% | 2.3% |
| Specialist - psychiatry | \$276,156,504 | 27.7% | 19.4% - 36.1% | 2.8% | 74.8% | 21.2% | 1.1% | 0.1% |
| Chiropractic | \$256,897,088 | 43.9% | 38.3% - 49.6% | 0.0% | 39.5% | 57.1% | 0.7% | 2.6% |
| Chemotherapy | \$251,015,056 | 19.8% | 2.6% - 37.1% | 0.0% | 95.1% | 4.6% | 0.3% | 0.0% |
| Oncology - radiation therapy | \$216,614,872 | 10.6% | 3.0% - 18.1% | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% |
| Ambulance | \$205,210,656 | 4.1% | 2.4% - 5.7% | 7.3% | 19.5% | 62.2% | 11.0% | 0.0% |
| Advanced imaging - CAT/CT/CTA: other | \$196,933,783 | 16.0% | 9.7% - 22.3% | 3.9% | 72.7% | 21.0% | 2.5% | 0.0% |
| Echography/ultrasono graphy - heart | \$185,481,483 | 16.7% | 10.7% - 22.8% | 0.0% | 52.2% | 47.1% | 0.7% | 0.0% |
| Lab tests - other (Medicare fee schedule) | \$182,305,995 | 8.1% | 5.3% - 11.0% | 0.1% | 62.5% | 25.5% | 11.9% | 0.0% |
| Emergency room visit | \$181,297,441 | 9.4% | 7.3% - 11.5% | 1.8% | 33.9% | 0.0% | 63.8% | 0.5% |
| Other tests - other | \$177,613,915 | 14.7% | 10.8% - 18.7% | 3.1% | 53.6% | 39.3% | 3.9% | 0.0% |
| Specialist - opthamology | \$163,438,427 | 7.1% | 5.1% - 9.2% | 0.3% | 93.7% | 4.7% | 1.4% | 0.0% |
| All Type of Services (Incl. Codes Not Listed) | \$10,939,319,559 | 12.9% | 12.1% - 13.8% | 1.5% | 61.8% | 13.2% | 22.9% | 0.5% |

Table B2: Top 20 Service Types with Highest Improper Payments: DME

| | | | _ | | Туг | e of Error | | |
|--|-----------------------------------|---------------|-------------------------------|-------------------------|---------------------------------------|---------------------------------------|----------------------|-------|
| Service Type Billed to DME | Projected Improper Payments | Error Rate | 95% Confidence Interval | No Document ation | Insufficien t Document ation | Medically Unnecessa ry Services | Incorrec t Coding | Other |
| Oxygen Supplies/Equipment | \$1,227,041,101 | 75.1% | 72.8% - 77.3% | 0.2% | 63.1% | 36.3% | 0.2% | 0.2% |
| Glucose Monitor | \$1,114,010,346 | 85.9% | 84.0% - 87.8% | 0.7% | 50.0% | 49.1% | 0.0% | 0.2% |
| Wheelchairs Motorized | \$822,105,083 | 92.6% | 86.0% - 99.3% | 0.0% | 63.6% | 36.4% | 0.0% | 0.0% |
| All Policy Groups with Less than 30 Claims Nebulizers & Related | \$655,689,620 | 56.9% | 44.1% - 69.7% | 0.9% | 60.2% | 37.7% | 0.0% | 1.3% |
| Drugs | \$457,143,231 | 67.6% | 59.3% - 75.8% | 4.2% | 67.5% | 27.8% | 0.1% | 0.3% |
| CPAP | \$336,863,306 | 67.6% | 62.6% - 72.7% | 0.6% | 67.8% | 31.3% | 0.0% | 0.3% |
| All Other Codes | \$305,776,396 | 63.6% | 56.5% - 70.7% | 4.0% | 66.0% | 29.7% | 0.4% | 0.0% |
| Immunosuppressive Drugs | \$270,032,267 | 62.8% | 52.1% - 73.5% | 1.5% | 64.3% | 34.2% | 0.0% | 0.0% |
| Enteral Nutrition | \$266,995,082 | 68.5% | 60.0% - 77.1% | 0.2% | 56.3% | 43.5% | 0.0% | 0.0% |
| Wheelchairs Options/Accessories | \$265,939,233 | 90.0% | 79.4% -100.5% | 0.0% | 43.4% | 56.5% | 0.0% | 0.1% |
| Infusion Pumps & Related Drugs | \$265,723,050 | 80.9% | 65.1% - 96.6% | 0.0% | 75.5% | 24.5% | 0.0% | 0.0% |
| Wheelchairs Manual | \$211,846,705 | 90.6% | 85.3% - 96.0% | 0.3% | 61.9% | 37.4% | 0.4% | 0.1% |
| Lower Limb Orthoses | \$193,528,373 | 67.2% | 49.3% - 85.2% | 2.4% | 73.5% | 23.9% | 0.0% | 0.2% |
| Diabetic Shoes | \$193,431,651 | 77.4% | 70.1% - 84.7% | 0.9% | 66.7% | 31.1% | 0.0% | 1.4% |
| Hospital Beds/Accessories | \$169,594,758 | 86.7% | 83.1% - 90.3% | 1.1% | 60.5% | 36.1% | 1.6% | 0.7% |
| Surgical Dressings | \$146,760,612 | 76.4% | 60.7% - 92.2% | 6.8% | 69.8% | 23.2% | 0.3% | 0.0% |
| Ostomy Supplies | \$100,059,705 | 61.9% | 51.0% - 72.7% | 0.0% | 67.4% | 32.3% | 0.0% | 0.3% |
| Respiratory Assist Device | \$77,592,020 | 61.7% | 50.3% - 73.2% | 0.0% | 75.2% | 24.8% | 0.0% | 0.0% |
| Support Surfaces | \$60,652,179 | 73.6% | 58.5% - 88.6% | 0.0% | 74.3% | 16.5% | 3.2% | 6.0% |
| Urological Supplies | \$59,524,108 | 38.3% | 21.0% - 55.6% | 0.2% | 31.8% | 63.6% | 0.1% | 4.4% |
| Walkers | \$51,083,922 | 72.7% | 64.4% - 80.9% | 0.0% | 60.6% | 38.6% | 0.0% | 0.8% |
| All Type of Services (Incl. Codes Not Listed) | \$7,251,392,747 | 73.8% | 71.5% - 76.1% | 1.0% | 61.4% | 37.1% | 0.1% | 0.4% |

Table B3: Top 20 Service Types with Highest Improper Payments: Part A excluding Inpatient Hospital PPS

Type of Error Service Type Billed to Part A **Projected** 95% Insuffici Error No Medically excluding **Improper** Confidence ent Incorrec Rate Other **Docume** Unnecessa **Inpatient Hospital Payments** Interval **Docume** t Coding ry Services ntation PPS (Type of Bill) ntation Hospital Outpatient \$1,530,148,047 5.3% 4.6% - 6.1% 0.3% 80.9% 13.8% 4.7% 0.2% \$995,517,962 60.1% Home Health 4.8% 3.6% -6.0% 3.1% 27.5% 6.5% 2.7% SNF Inpatient \$772,666,256 3.3% 1.9% - 4.6% 0.0% 37.4% 23.4% 38.3% 0.9% 0.0% Clinic ESRD \$298,310,567 3.9% 2.3% - 5.5% 0.4% 85.3% 9.7% 4.5% Nonhospital based 1.0% - 3.7% 0.0% hospice \$269,121,243 2.4% 27.3% 69.1% 0.1% 3.5% Critical Access 7.1% Hospital \$214,648,018 5.3% 3.5% -0.2% 81.2% 14.1% 4.2% 0.3% 0.0% 10.2% Hospital Inpatient \$183,380,391 2.1% 1.5% - 2.7% 0.0% 89.8% 0.0%

| Service Type | | | | | T | Type of Error | | |
|--|-----------------------------------|---------------|-------------------------------|-------------------------|---------------------------------------|---------------------------------------|----------------------|-------|
| Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Projected Improper Payments | Error Rate | 95% Confidence Interval | No Docume ntation | Insuffici ent Docume ntation | Medically Unnecessa ry Services | Incorrec t Coding | Other |
| (Part A) | | | | | | | | |
| SNF Inpatient Part B | \$125,708,426 | 7.6% | 4.4% - 10.7% | 0.8% | 89.9% | 3.7% | 5.0% | 0.6% |
| Hospital Other Part B | \$117,971,251 | 27.3% | 24.0% - 30.5% | 0.4% | 71.3% | 26.4% | 1.8% | 0.1% |
| Hospital based hospice | \$54,215,716 | 3.8% | (0.2%) - 7.7% | 28.6% | 29.1% | 41.0% | 1.3% | 0.0% |
| Hospital Inpatient Part B | \$44,515,938 | 11.2% | 0.4% - 22.0% | 0.0% | 94.2% | 5.3% | 0.5% | 0.0% |
| Clinic – Freestanding (Effective April 1, 2010) | \$32,477,464 | 6.9% | 4.5% - 9.3% | 2.6% | 94.8% | 2.6% | 0.0% | 0.0% |
| Clinic OPT | \$32,407,925 | 5.2% | 2.5% - 8.0% | 22.0% | 73.5% | 0.3% | 3.4% | 0.7% |
| SNF Outpatient | \$24,628,531 | 13.3% | 9.3% - 17.2% | 0.0% | 78.1% | 6.1% | 1.0% | 14.8% |
| Clinic CORF | \$20,528,731 | 10.2% | 1.6% - 18.9% | 11.3% | 87.2% | 0.0% | 1.5% | 0.0% |
| Hospital Swing Bed | \$13,928,431 | 1.2% | 0.7% - 1.6% | 0.0% | 0.0% | 100.0% | 0.0% | 0.0% |
| Clinical Rural Health | \$13,853,420 | 2.3% | 1.5% - 3.1% | 8.7% | 88.1% | 3.2% | 0.0% | 0.0% |
| Community Mental Health Centers | \$1,598,668 | 0.5% | (0.0%) - 1.0% | 50.9% | 0.0% | 49.1% | 0.0% | 0.0% |
| All Codes With Less Than 30 Claims | \$0 | 0.0% | 0.0% - 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Home Health (Part B Only) | \$0 | 0.0% | 0.0% - 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| All Type of Services (Incl. Codes Not Listed) | \$4,745,626,984 | 4.2% | 3.7% - 4.7% | 1.4% | 59.6% | 27.7% | 9.8% | 1.5% |

Table B4: Top 20 Service Types with Highest Improper Payments: Part A Inpatient Hospital PPS

| Service Type | Type of Error | | | | | | | |
|--|-----------------------------------|---------------|-------------------------------|-------------------------|---------------------------------------|---------------------------------------|----------------------|-------|
| Billed to Part A Inpatient Hospital PPS (MS-DRG Groups) | Projected Improper Payments | Error Rate | 95% Confidence Interval | No Docume ntation | Insufficien t Document ation | Medically Unnecessa ry Services | Incorrec t Coding | Other |
| All Other Codes | \$6,883,073,837 | 9.0% | 6.8% - 11.3% | 0.3% | 8.4% | 72.7% | 18.6% | 0.0% |
| Major Joint Replacement Or Reattachment Of Lower Extremity (469 | | | | | | | | |
| , 470) | \$1,416,348,286 | 24.3% | 16.2% - 32.5% | 0.0% | 20.0% | 80.0% | 0.0% | 0.0% |
| Permanent Cardiac Pacemaker Implant (242, 243, 244) | \$988,741,766 | 47.2% | 41.2% - 53.3% | 0.0% | 0.0% | 81.8% | 18.2% | 0.0% |
| Perc Cardiovasc Proc W Drug-Eluting Stent (246, 247) | \$385,315,015 | 17.1% | 5.1% - 29.1% | 0.0% | 6.8% | 93.2% | 0.0% | 0.0% |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours (871, 872) | \$247,989,539 | 5.1% | 2.5% - 7.8% | 0.0% | 29.1% | 0.0% | 70.9% | 0.0% |
| Chest Pain (313) | \$168,421,077 | 20.9% | 9.2% - 32.5% | 0.0% | 25.4% | 71.1% | 0.4% | 3.1% |
| G.I. Hemorrhage (377, 378, 379) | \$149,527,576 | 9.9% | 6.3% - 13.5% | 0.0% | 0.0% | 79.3% | 20.7% | 0.0% |
| Major Small & Large Bowel Procedures (329, 330, 331) | \$149,091,352 | 6.6% | (1.0%) - 14.2% | 0.0% | 34.2% | 11.1% | 54.7% | 0.0% |
| Respiratory Infections & Inflammations (177, 178, 179) | \$138,235,571 | 6.4% | 5.8% - 7.0% | 0.0% | 0.0% | 59.9% | 40.1% | 0.0% |

| Service Type | | | | | Ту | pe of Error | | |
|--|-----------------------------------|---------------|-------------------------------|-------------------------|---------------------------------------|---------------------------------------|----------------------|-------|
| Billed to Part A Inpatient Hospital PPS (MS-DRG Groups) | Projected Improper Payments | Error Rate | 95% Confidence Interval | No Docume ntation | Insufficien t Document ation | Medically Unnecessa ry Services | Incorrec t Coding | Other |
| Esophagitis, Gastroent & Misc Digest Disorders (391, 392) | \$135,111,217 | 12.6% | 10.5% - 14.6% | 0.0% | 0.0% | 99.9% | 0.1% | 0.0% |
| Kidney & Urinary Tract Infections (689, 690) | \$117,843,881 | 9.6% | 1.0% - 18.3% | 0.0% | 0.0% | 59.4% | 40.6% | 0.0% |
| Nutritional & Misc Metabolic Disorders (640, 641) | \$115,574,973 | 9.7% | 6.5% - 12.8% | 0.0% | 0.0% | 96.0% | 4.0% | 0.0% |
| Renal Failure (682, 683, 684) Syncope & Collapse | \$86,143,600 | 4.5% | 2.7% - 6.4% | 0.0% | 0.0% | 82.1% | 17.9% | 0.0% |
| (312) Heart Failure & Shock | \$74,323,384 | 11.2% | 7.9% - 14.5% | 0.0% | 5.1% | 90.2% | 4.7% | 0.0% |
| (291, 292, 293) Cardiac Arrhythmia & Conduction Disorders | \$72,755,513 | 1.6% | 0.1% - 3.1% | 0.0% | 0.0% | 9.3% | 83.3% | 7.4% |
| (308, 309, 310) Simple Pneumonia & | \$64,116,976 | 4.4% | 1.5% - 7.2% | 0.0% | 20.7% | 55.5% | 23.8% | 0.0% |
| Pleurisy (193, 194, 195) Acute Myocardial | \$62,310,615 | 2.4% | 0.6% - 4.2% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| Infarction, Discharged Alive (280, 281, | ¢52,000,166 | 4.00/ | (0.8%) - | 0.00/ | 0.00/ | 0.00/ | 100.00/ | 0.00/ |
| 282) Chronic Obstructive Pulmonary Disease | \$53,990,166 | 4.9% | 10.6% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| (190, 191, 192) Hip & Femur Procedures Except | \$8,601,782 | 0.4% | 0.4% - 0.5% | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% |
| Major Joint (480, 481, 482) Intracranial | \$7,780,135 | 0.4% | 0.1% - 0.7% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| Hemorrhage Or Cerebral Infarction (064, 065, 066) | \$7,029,328 | 0.4% | (0.1%) - 0.9% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| All Type of Services (Incl. Codes Not Listed) | \$11,332,325,591 | 9.5% | 7.8% - 11.2% | 0.2% | 9.5% | 71.8% | 18.4% | 0.1% |

Appendix C: Error Rates and Type of Error by Type of Service for each Claim Type

Table C1: Top 20 Service Type Error Rates: Part B

| Table C1: Top 20 | Bei vice i | ype Error Ka | ites. I alt D | | e E | | |
|---|---------------------------------|-------------------------------|-------------------------|-------------------------------|--------------------------------------|---------------------|-------|
| | ъ., | | | Турс | e of Error | ı | |
| Service Type Billed to Part B (BETOS codes) | Paid Claims Error Rate | 95% Confidence Interval | No Documenta tion | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other |
| Chiropractic | 43.9% | 38.3% - 49.6% | 0.0% | 39.5% | 57.1% | 0.7% | 2.6% |
| Hospital visit - initial | 28.2% | 24.1% - 32.4% | 0.6% | 38.3% | 0.0% | 60.8% | 0.2% |
| Specialist - psychiatry | 27.7% | 19.4% - 36.1% | 2.8% | 74.8% | 21.2% | 1.1% | 0.1% |
| Office visits – new | 24.0% | 20.4% - 27.5% | 0.7% | 30.5% | 2.1% | 64.5% | 2.3% |
| Consultations | 23.3% | 20.9% - 25.8% | 0.3% | 21.6% | 0.0% | 78.0% | 0.1% |
| Nursing home visit | 21.7% | 18.0% - 25.3% | 3.8% | 51.6% | 0.4% | 44.1% | 0.2% |
| Hospital visit – subsequent | 20.5% | 17.0% - 23.9% | 1.4% | 62.8% | 0.0% | 35.8% | 0.0% |
| Lab tests - other (non- Medicare fee schedule) | 19.9% | 14.7% - 25.1% | 1.2% | 66.4% | 31.8% | 0.3% | 0.3% |
| Chemotherapy | 19.8% | 2.6% - 37.1% | 0.0% | 95.1% | 4.6% | 0.3% | 0.0% |
| Minor procedures - other (Medicare fee schedule) | 18.1% | 14.9% - 21.2% | 1.7% | 82.8% | 12.4% | 2.0% | 1.1% |
| Echography/ultrasonogr aphy – heart | 16.7% | 10.7% - 22.8% | 0.0% | 52.2% | 47.1% | 0.7% | 0.0% |
| Advanced imaging - CAT/CT/CTA: other | 16.0% | 9.7% - 22.3% | 3.9% | 72.7% | 21.0% | 2.5% | 0.0% |
| Other tests – other | 14.7% | 10.8% - 18.7% | 3.1% | 53.6% | 39.3% | 3.9% | 0.0% |
| Office visits – established | 12.3% | 11.4% - 13.2% | 1.5% | 54.4% | 0.5% | 42.8% | 0.8% |
| Oncology - radiation therapy | 10.6% | 3.0% - 18.1% | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% |
| Emergency room visit | 9.4% | 7.3% - 11.5% | 1.8% | 33.9% | 0.0% | 63.8% | 0.5% |
| All Other Codes | 9.3% | 7.8% - 10.7% | 2.0% | 76.7% | 16.7% | 4.0% | 0.7% |
| Other drugs | 8.4% | 3.4% - 13.5% | 0.1% | 63.1% | 30.9% | 5.9% | 0.0% |
| Lab tests - other (Medicare fee schedule) | 8.1% | 5.3% - 11.0% | 0.1% | 62.5% | 25.5% | 11.9% | 0.0% |
| Specialist - opthamology | 7.1% | 5.1% - 9.2% | 0.3% | 93.7% | 4.7% | 1.4% | 0.0% |
| Ambulance | 4.1% | 2.4% - 5.7% | 7.3% | 19.5% | 62.2% | 11.0% | 0.0% |
| All Types of Services | 12.9% | 12.1% - 13.8% | 1.5% | 61.8% | 13.2% | 22.9% | 0.5% |

Table C2: Top 20 Service Type Error Rates: DME

| | | | Type of Error | | | | | | |
|--|---------------------------------|-------------------------------|-------------------------|-------------------------------|--------------------------------------|---------------------|-------|--|--|
| Service Type Billed to DMEs | Paid Claims Error Rate | 95% Confidence Interval | No Documenta tion | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other | | |
| Wheelchairs Motorized | 92.6% | 86.0% - 99.3% | 0.0% | 63.6% | 36.4% | 0.0% | 0.0% | | |
| Wheelchairs Manual | 90.6% | 85.3% - 96.0% | 0.3% | 61.9% | 37.4% | 0.4% | 0.1% | | |
| Wheelchairs Options/Accessories Hospital | 90.0% | 79.4% -100.5% | 0.0% | 43.4% | 56.5% | 0.0% | 0.1% | | |
| Beds/Accessories | 86.7% | 83.1% - 90.3% | 1.1% | 60.5% | 36.1% | 1.6% | 0.7% | | |

| | | | | Туре | e of Error | | |
|---|---------------------------------|-------------------------------|-------------------------|-------------------------------|--------------------------------------|---------------------|-------|
| Service Type Billed to DMEs | Paid Claims Error Rate | 95% Confidence Interval | No Documenta tion | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other |
| Glucose Monitor | 85.9% | 84.0% - 87.8% | 0.7% | 50.0% | 49.1% | 0.0% | 0.2% |
| Infusion Pumps & Related Drugs | 80.9% | 65.1% - 96.6% | 0.0% | 75.5% | 24.5% | 0.0% | 0.0% |
| Diabetic Shoes | 77.4% | 70.1% - 84.7% | 0.9% | 66.7% | 31.1% | 0.0% | 1.4% |
| Surgical Dressings | 76.4% | 60.7% - 92.2% | 6.8% | 69.8% | 23.2% | 0.3% | 0.0% |
| Oxygen Supplies/Equipment | 75.1% | 72.8% - 77.3% | 0.2% | 63.1% | 36.3% | 0.2% | 0.2% |
| Support Surfaces | 73.6% | 58.5% - 88.6% | 0.0% | 74.3% | 16.5% | 3.2% | 6.0% |
| Walkers | 72.7% | 64.4% - 80.9% | 0.0% | 60.6% | 38.6% | 0.0% | 0.8% |
| Enteral Nutrition | 68.5% | 60.0% - 77.1% | 0.2% | 56.3% | 43.5% | 0.0% | 0.0% |
| CPAP | 67.6% | 62.6% - 72.7% | 0.6% | 67.8% | 31.3% | 0.0% | 0.3% |
| Nebulizers & Related Drugs | 67.6% | 59.3% - 75.8% | 4.2% | 67.5% | 27.8% | 0.1% | 0.3% |
| Lower Limb Orthoses | 67.2% | 49.3% - 85.2% | 2.4% | 73.5% | 23.9% | 0.0% | 0.2% |
| All Other Codes | 63.6% | 56.5% - 70.7% | 4.0% | 66.0% | 29.7% | 0.4% | 0.0% |
| Immunosuppressive Drugs | 62.8% | 52.1% - 73.5% | 1.5% | 64.3% | 34.2% | 0.0% | 0.0% |
| Ostomy Supplies | 61.9% | 51.0% - 72.7% | 0.0% | 67.4% | 32.3% | 0.0% | 0.3% |
| Respiratory Assist Device | 61.7% | 50.3% - 73.2% | 0.0% | 75.2% | 24.8% | 0.0% | 0.0% |
| All Policy Groups with Less than 30 Claims | 56.9% | 44.1% - 69.7% | 0.9% | 60.2% | 37.7% | 0.0% | 1.3% |
| Urological Supplies | 38.3% | 21.0% - 55.6% | 0.2% | 31.8% | 63.6% | 0.1% | 4.4% |
| All Types of Services | 73.8% | 71.5% - 76.1% | 1.0% | 61.4% | 37.1% | 0.1% | 0.4% |

Table C3: Top 20 Service Type Error Rates: Part A excluding Inpatient Hospital PPS

| Service Service Type | | J.F. | | Type of Error | | | | | | |
|---|---------------------------------|-------------------------------|-------------------------|-------------------------------|--------------------------------------|----------------------|-------|--|--|--|
| Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Paid Claims Error Rate | 95% Confidence Interval | No Document ation | Insufficient Documentation | Medically Unnecessary Services | Incorrec t Coding | Other | | | |
| Hospital Other Part B | 27.3% | 24.0% - 30.5% | 0.4% | 71.3% | 26.4% | 1.8% | 0.1% | | | |
| SNF Outpatient | 13.3% | 9.3% - 17.2% | 0.0% | 78.1% | 6.1% | 1.0% | 14.8% | | | |
| Hospital Inpatient Part B | 11.2% | 0.4% - 22.0% | 0.0% | 94.2% | 5.3% | 0.5% | 0.0% | | | |
| Clinic CORF | 10.2% | 1.6% - 18.9% | 11.3% | 87.2% | 0.0% | 1.5% | 0.0% | | | |
| SNF Inpatient Part B | 7.6% | 4.4% - 10.7% | 0.8% | 89.9% | 3.7% | 5.0% | 0.6% | | | |
| Clinic – Freestanding (Effective April 1, 2010) | 6.9% | 4.5% - 9.3% | 2.6% | 94.8% | 2.6% | 0.0% | 0.0% | | | |
| Hospital Outpatient | 5.3% | 4.6% - 6.1% | 0.3% | 80.9% | 13.8% | 4.7% | 0.2% | | | |
| Critical Access Hospital | 5.3% | 3.5% - 7.1% | 0.2% | 81.2% | 14.1% | 4.2% | 0.3% | | | |
| Clinic OPT | 5.2% | 2.5% - 8.0% | 22.0% | 73.5% | 0.3% | 3.4% | 0.7% | | | |
| Home Health | 4.8% | 3.6% - 6.0% | 3.1% | 27.5% | 60.1% | 6.5% | 2.7% | | | |
| Clinic ESRD | 3.9% | 2.3% - 5.5% | 0.4% | 85.3% | 9.7% | 4.5% | 0.0% | | | |
| Hospital based hospice | 3.8% | (0.2%) - 7.7% | 28.6% | 29.1% | 41.0% | 1.3% | 0.0% | | | |
| SNF Inpatient | 3.3% | 1.9% - 4.6% | 0.0% | 37.4% | 23.4% | 38.3% | 0.9% | | | |
| Nonhospital based hospice | 2.4% | 1.0% - 3.7% | 0.0% | 27.3% | 69.1% | 0.1% | 3.5% | | | |
| Clinical Rural Health | 2.3% | 1.5% - 3.1% | 8.7% | 88.1% | 3.2% | 0.0% | 0.0% | | | |
| Hospital Inpatient (Part A) | 2.1% | 1.5% - 2.7% | 0.0% | 89.8% | 0.0% | 0.0% | 10.2% | | | |

| Service Service Type | | | Type of Error | | | | |
|---|---------------------------------|-------------------------------|-------------------------|-------------------------------|--------------------------------------|----------------------|-------|
| Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Paid Claims Error Rate | 95% Confidence Interval | No Document ation | Insufficient Documentation | Medically Unnecessary Services | Incorrec t Coding | Other |
| Hospital Swing Bed | 1.2% | 0.7% - 1.6% | 0.0% | 0.0% | 100.0% | 0.0% | 0.0% |
| Community Mental Health Centers | 0.5% | (0.0%) - 1.0% | 50.9% | 0.0% | 49.1% | 0.0% | 0.0% |
| All Codes With Less Than 30 Claims | 0.0% | 0.0% - 0.0% | N/A | N/A | N/A | N/A | N/A |
| Home Health (Part B Only) | 0.0% | 0.0% - 0.0% | N/A | N/A | N/A | N/A | N/A |
| All Types of Services | 4.2% | 3.7% - 4.7% | 1.4% | 59.6% | 27.7% | 9.8% | 1.5% |

Table C4: Top 20 Service Type Error Rates: Part A Inpatient Hospital PPS

| | Bel vice | Type Error Rates: Part A Inpatient Hospital PPS Type of Error | | | | | |
|---|---------------------------------|--|-------------------------|-------------------------------|--------------------------------------|----------------------|-------|
| Service Types for Which Part A Inpatient Hospital PPS are Responsible (MS-DRG Groups) | Paid Claims Error Rate | 95% Confidence Interval | No Document ation | Insufficient Documentation | Medically Unnecessary Services | Incorrec t Coding | Other |
| Permanent Cardiac Pacemaker Implant (242 , 243 , 244) | 47.2% | 41.2% - 53.3% | 0.0% | 0.0% | 81.8% | 18.2% | 0.0% |
| Major Joint Replacement Or Reattachment Of Lower Extremity (469, 470) | 24.3% | 16.2% - 32.5% | 0.0% | 20.0% | 80.0% | 0.0% | 0.0% |
| | | | | | | | |
| Chest Pain (313) Perc Cardiovasc Proc W Drug-Eluting Stent (246 | 20.9% | 9.2% - 32.5% | 0.0% | 25.4% | 71.1% | 0.4% | 3.1% |
| , 247) Esophagitis, Gastroent & Misc Digest Disorders (391, 392) | 17.1% | 5.1% - 29.1% | 0.0% | 0.0% | 93.2% | 0.0% | 0.0% |
| Syncope & Collapse (312) G.I. Hemorrhage (377, | 11.2% | 7.9% - 14.5% | 0.0% | 5.1% | 90.2% | 4.7% | 0.0% |
| 378, 379) | 9.9% | 6.3% - 13.5% | 0.0% | 0.0% | 79.3% | 20.7% | 0.0% |
| Nutritional & Misc Metabolic Disorders (640, 641) | 9.7% | 6.5% - 12.8% | 0.0% | 0.0% | 96.0% | 4.0% | 0.0% |
| Kidney & Urinary Tract Infections (689, 690) | 9.6% | 1.0% - 18.3% | 0.0% | 0.0% | 59.4% | 40.6% | 0.0% |
| All Other Codes | 9.0% | 6.8% - 11.3% | 0.3% | 8.4% | 72.7% | 18.6% | 0.0% |
| Major Small & Large Bowel Procedures (329, 330, 331) | 6.6% | (1.0%) - 14.2% | 0.0% | 34.2% | 11.1% | 54.7% | 0.0% |
| Respiratory Infections & Inflammations (177, 178, 179) | 6.4% | 5.8% - 7.0% | 0.0% | 0.0% | 59.9% | 40.1% | 0.0% |
| Septicemia Or Severe Sepsis W/O Mv 96+ | | | | | | | |
| Hours (871, 872) Acute Myocardial | 5.1% | 2.5% - 7.8% | 0.0% | 29.1% | 0.0% | 70.9% | 0.0% |
| Infarction, Discharged Alive (280, 281, 282) | 4.9% | (0.8%) - 10.6% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| Renal Failure (682, 683, 684) | 4.5% | 2.7% - 6.4% | 0.0% | 0.0% | 82.1% | 17.9% | 0.0% |
| Cardiac Arrhythmia & Conduction Disorders (308, 309, 310) | 4.4% | 1.5% - 7.2% | 0.0% | 20.7% | 55.5% | 23.8% | 0.0% |
| Simple Pneumonia & Pleurisy (193, 194, | 2.4% | 0.6% - 4.2% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |

| 195) | | | | | | | |
|-------------------------|------|----------------|------|--------|-------|--------|------|
| Heart Failure & Shock | | | | | | | |
| (291, 292, 293) | 1.6% | 0.1% - 3.1% | 0.0% | 0.0% | 9.3% | 83.3% | 7.4% |
| Chronic Obstructive | | | | | | | |
| Pulmonary Disease (190 | | | | | | | |
| , 191 , 192) | 0.4% | 0.4% - 0.5% | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% |
| Intracranial Hemorrhage | | | | | | | |
| Or Cerebral Infarction | | | | | | | |
| (064, 065, 066) | 0.4% | (0.1%) - 0.9% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| Hip & Femur | | | | | | | |
| Procedures Except | | | | | | | |
| Major Joint (480, 481, | | | | | | | |
| 482) | 0.4% | 0.1% - 0.7% | 0.0% | 0.0% | 0.0% | 100.0% | 0.0% |
| All Types of Services | 9.5% | 7.8% - 11.2% | 0.2% | 9.5% | 71.8% | 18.4% | 0.1% |

Appendix D: Projected Improper Payment Amounts by Error Type

1. No Documentation Errors

Table D1 is a combined list of the services with the highest projected improper payments due to no documentation errors for all contractor types. All appendix D tables are sorted in descending order by projected improper payments.

Table D1: Top 20 Services with No Documentation Errors: All Contractors

| Table D1: Top 20 Services with No Document | No Documentation Errors | | | | | |
|---|---------------------------|--------------------------------|---------------------------|--|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Home Health | 0.1% | \$31,349,590 | (0.0%) - 0.3% | | | |
| Minor procedures – musculoskeletal | 3.1% | \$27,729,707 | 2.6% - 3.6% | | | |
| Office visits – established | 0.2% | \$21,951,059 | 0.1% - 0.3% | | | |
| Nebulizers & Related Drugs | 2.9% | \$19,373,311 | (1.8%) - 7.6% | | | |
| Hospital based hospice | 1.1% | \$15,486,796 | (1.0%) - 3.2% | | | |
| Hospital visit – subsequent | 0.3% | \$15,158,949 | 0.1% - 0.5% | | | |
| Ambulance | 0.3% | \$15,037,966 | (0.2%) - 0.8% | | | |
| Nursing home visit | 0.8% | \$13,005,308 | 0.1% - 1.5% | | | |
| Minor procedures - other (Medicare fee schedule) | 0.3% | \$11,922,024 | (0.0%) - 0.6% | | | |
| Surgical Dressings | 5.2% | \$9,974,792 | (2.5%) - 12.9% | | | |
| Advanced imaging - CAT/CT/CTA: other | 0.6% | \$7,747,739 | (0.6%) - 1.9% | | | |
| Specialist – psychiatry | 0.8% | \$7,731,376 | (0.1%) - 1.6% | | | |
| Glucose Monitor | 0.6% | \$7,396,327 | 0.1% - 1.1% | | | |
| Clinic OPT | 1.2% | \$7,142,133 | (0.4%) - 2.7% | | | |
| Lab tests - other (non-Medicare fee schedule) | 0.2% | \$6,616,621 | 0.0% - 0.4% | | | |
| Upper Limb Orthoses | 9.6% | \$6,219,708 | (0.7%) - 19.9% | | | |
| All Policy Groups with Less than 30 Claims | 0.5% | \$5,893,875 | (0.2%) - 1.3% | | | |
| Other tests – other | 0.5% | \$5,556,622 | (0.2%) - 1.1% | | | |
| Hospital Outpatient | 0.0% | \$4,896,950 | 0.0% - 0.0% | | | |
| Lower Limb Orthoses | 1.6% | \$4,552,550 | (1.4%) - 4.6% | | | |
| All Other Codes | 0.0% | \$79,959,936 | 0.0% - 0.1% | | | |
| Overall | 0.1% | \$324,703,340 | 0.1% - 0.1% | | | |

2. <u>Insufficient Documentation Errors</u>

Table D2 is a combined list of the services with the highest insufficient documentation paid claims error rates for Part B/DME/Part A including Inpatient Hospital PPS.

Table D2: Top 20 Services with Insufficient Documentation: All Contractors

| Tuble D2. Top 20 Bet vices with insufficient | Insufficient Documentation Errors | | | | |
|---|-----------------------------------|--------------------------------|---------------------------|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | |
| Hospital Outpatient | 4.3% | \$1,237,449,740 | 3.6% - 5.0% | | |
| Office visits - established | 6.7% | \$802,662,980 | 5.9% - 7.5% | | |
| Oxygen Supplies/Equipment | 47.4% | \$774,472,526 | 44.8% - 49.9% | | |
| Hospital visit - subsequent | 12.8% | \$689,969,120 | 9.6% - 16.1% | | |
| Minor procedures - other (Medicare fee schedule) | 14.9% | \$568,122,336 | 12.1% - 17.7% | | |
| Glucose Monitor | 43.0% | \$557,039,345 | 40.2% - 45.7% | | |
| Wheelchairs Motorized | 58.9% | \$522,590,763 | 43.5% - 74.2% | | |
| All Policy Groups with Less than 30 Claims | 34.2% | \$394,411,152 | 22.1% - 46.4% | | |
| Lab tests - other (non-Medicare fee schedule) | 13.2% | \$372,686,693 | 7.9% - 18.5% | | |
| Nebulizers & Related Drugs | 45.6% | \$308,782,534 | 33.5% - 57.8% | | |
| SNF Inpatient | 1.2% | \$289,242,076 | 0.3% - 2.1% | | |
| Major Joint Replacement Or Reattachment Of Lower Extremity (469, 470) | 4.9% | \$283,793,493 | 0.2% - 9.6% | | |
| Other drugs | 5.3% | \$275,087,046 | 1.2% - 9.4% | | |
| Home Health | 1.3% | \$273,768,518 | 0.6% - 2.1% | | |
| Clinic ESRD | 3.3% | \$254,560,897 | 1.8% - 4.9% | | |
| Chemotherapy | 18.9% | \$238,687,957 | 1.5% - 36.2% | | |
| CPAP | 45.9% | \$228,484,425 | 40.7% - 51.0% | | |
| Oncology - radiation therapy | 10.6% | \$216,614,872 | 3.0% - 18.1% | | |
| Specialist - psychiatry | 20.7% | \$206,432,788 | 12.6% - 28.9% | | |
| Infusion Pumps & Related Drugs | 61.1% | \$200,705,828 | 35.5% - 86.7% | | |
| All Other Codes | 3.2% | \$6,428,379,823 | 2.8% - 3.7% | | |
| Overall | 4.6% | \$15,123,944,912 | 4.2% - 5.1% | | |

3. Medically Unnecessary Errors

Table D3 lists the top twenty medically unnecessary services for Part B/DME/Part A including Inpatient Hospital PPS.

Table D3: Top 20 Medically Unnecessary Services: All Contractors

| Table 13. Top 20 Vicultary Officessary Se | Medically Unnecessary Errors | | | | | |
|---|------------------------------|--------------------------------|---------------------------|--|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Major Joint Replacement Or Reattachment Of Lower Extremity (469, 470) | 19.5% | \$1,132,554,793 | 12.0% - 26.9% | | | |
| Permanent Cardiac Pacemaker Implant (242, 243, 244) | 38.7% | \$809,008,011 | 32.9% - 44.4% | | | |
| Home Health | 2.9% | \$598,199,047 | 2.0% - 3.7% | | | |
| Glucose Monitor | 42.2% | \$547,427,190 | 39.6% - 44.8% | | | |
| Oxygen Supplies/Equipment | 27.3% | \$445,935,166 | 25.2% - 29.4% | | | |
| Perc Cardiovasc Proc W Drug-Eluting Stent (246, 247) | 15.9% | \$358,972,968 | 4.0% - 27.9% | | | |
| Wheelchairs Motorized | 33.7% | \$299,514,320 | 19.1% - 48.4% | | | |
| All Policy Groups with Less than 30 Claims | 21.4% | \$247,034,480 | 8.6% - 34.2% | | | |
| Hospital Outpatient | 0.7% | \$211,648,949 | 0.6% - 0.9% | | | |
| Nonhospital based hospice | 1.6% | \$186,079,275 | 0.4% - 2.8% | | | |
| SNF Inpatient | 0.8% | \$180,573,195 | (0.1%) - 1.6% | | | |
| Lab tests - other (non-Medicare fee schedule) | 6.3% | \$178,788,211 | 4.6% - 8.1% | | | |
| Wheelchairs Options/Accessories | 50.8% | \$150,205,153 | 32.5% - 69.1% | | | |
| Chiropractic | 25.1% | \$146,721,768 | 19.9% - 30.3% | | | |
| Esophagitis, Gastroent & Misc Digest Disorders (391, 392) | 12.6% | \$135,017,898 | 10.5% - 14.6% | | | |
| Other drugs | 2.6% | \$134,716,800 | (0.5%) - 5.7% | | | |
| Ambulance | 2.5% | \$127,617,676 | 1.2% - 3.9% | | | |
| Nebulizers & Related Drugs | 18.8% | \$127,269,752 | 13.7% - 24.0% | | | |
| Chest Pain (313) | 14.8% | \$119,757,122 | 6.3% - 23.4% | | | |
| G.I. Hemorrhage (377, 378, 379) | 7.9% | \$118,528,322 | 4.7% - 11.0% | | | |
| All Other Codes | 3.5% | \$7,327,639,138 | 2.7% - 4.3% | | | |
| Overall | 4.2% | \$13,583,209,234 | 3.5% - 4.8% | | | |

4. Incorrect Coding Errors

Table D4 lists the services with the highest paid claims error rates due to incorrect coding for Part B/DME/Part A including Inpatient Hospital PPS.

Table D4: Top 20 Services with Incorrect Coding Errors: All Contractors

| Tuble B4. Top 20 Bet vices with incorrect Co | Incorrect Coding Errors | | | | | |
|---|---------------------------|--------------------------------|---------------------------|--|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Office visits - established | 5.3% | \$631,530,199 | 4.8% - 5.8% | | | |
| Consultations | 18.2% | \$523,067,988 | 16.0% - 20.3% | | | |
| Hospital visit - subsequent | 7.3% | \$393,973,832 | 5.8% - 8.8% | | | |
| SNF Inpatient | 1.3% | \$296,007,600 | 0.6% - 1.9% | | | |
| Hospital visit - initial | 17.2% | \$293,112,708 | 14.3% - 20.1% | | | |
| Office visits - new | 15.4% | \$188,549,224 | 12.5% - 18.4% | | | |
| Permanent Cardiac Pacemaker Implant (242, 243, 244) | 8.6% | \$179,733,755 | 7.3% - 9.9% | | | |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours (871, 872) | 3.6% | \$175,721,158 | 1.1% - 6.2% | | | |
| Nursing home visit | 9.6% | \$152,598,491 | 7.4% - 11.7% | | | |
| Emergency room visit | 6.0% | \$115,648,482 | 4.6% - 7.4% | | | |
| Major Small & Large Bowel Procedures (329, 330, 331) | 3.6% | \$81,512,478 | (3.0%) - 10.2% | | | |
| Hospital Outpatient | 0.3% | \$72,560,544 | 0.1% - 0.4% | | | |
| Home Health | 0.3% | \$64,917,401 | 0.1% - 0.5% | | | |
| Simple Pneumonia & Pleurisy (193, 194, 195) | 2.4% | \$62,310,615 | 0.6% - 4.2% | | | |
| Heart Failure & Shock (291, 292, 293) | 1.3% | \$60,569,163 | (0.2%) - 2.9% | | | |
| Respiratory Infections & Inflammations (177, 178, 179) | 2.6% | \$55,366,628 | 2.3% - 2.9% | | | |
| Acute Myocardial Infarction, Discharged Alive (280, 281, 282) | 4.9% | \$53,990,166 | (0.8%) - 10.6% | | | |
| Kidney & Urinary Tract Infections (689, 690) | 3.9% | \$47,889,304 | 1.7% - 6.1% | | | |
| G.I. Hemorrhage (377, 378, 379) | 2.1% | \$30,999,254 | 1.4% - 2.7% | | | |
| Hospital visit - critical care | 3.5% | \$29,838,812 | (0.4%) - 7.4% | | | |
| All Other Codes | 0.8% | \$1,560,455,744 | 0.5% - 1.0% | | | |
| Overall | 1.6% | \$5,070,353,544 | 1.3% - 1.8% | | | |

Table D5 includes incorrect coding errors that resulted in an under payment for Part B, DMEs and overall Part A (including Inpatient Hospital PPS) claim types.

Table D5: Top 20 Services with Underpayment Coding Errors: All Contractors

| Table D5: Top 20 Services with Under paying | Underpayment Coding Errors | | | | | |
|---|----------------------------|--------------------------------|---------------------------|--|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Office visits - established | 0.9% | \$105,399,673 | 0.7% - 1.0% | | | |
| Heart Failure & Shock (291, 292, 293) | 1.0% | \$43,594,715 | (0.5%) - 2.4% | | | |
| Hospital Outpatient | 0.1% | \$32,069,906 | 0.0% - 0.2% | | | |
| Home Health | 0.1% | \$31,174,925 | 0.0% - 0.3% | | | |
| Hospital visit - subsequent | 0.5% | \$28,792,653 | 0.2% - 0.9% | | | |
| Simple Pneumonia & Pleurisy (193, 194, 195) | 0.9% | \$23,712,812 | (0.8%) - 2.6% | | | |
| Other drugs | 0.4% | \$21,351,537 | (0.2%) - 1.1% | | | |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours (871, 872) | 0.4% | \$18,983,386 | 0.1% - 0.7% | | | |
| SNF Inpatient | 0.1% | \$18,306,117 | 0.0% - 0.1% | | | |
| Emergency room visit | 0.9% | \$16,740,499 | 0.4% - 1.4% | | | |
| Consultations | 0.5% | \$13,834,443 | 0.2% - 0.8% | | | |
| Kidney & Urinary Tract Infections (689, 690) | 1.1% | \$12,930,822 | (1.0%) - 3.1% | | | |
| Nursing home visit | 0.7% | \$11,584,225 | 0.2% - 1.2% | | | |
| Cardiac Arrhythmia & Conduction Disorders (308, 309, 310) | 0.7% | \$10,461,393 | (0.7%) - 2.1% | | | |
| Acute Myocardial Infarction, Discharged Alive (280, 281, 282) | 0.9% | \$10,026,118 | 0.5% - 1.3% | | | |
| Renal Failure (682, 683, 684) | 0.4% | \$6,956,540 | 0.0% - 0.7% | | | |
| Hospital visit - initial | 0.3% | \$5,660,148 | (0.1%) - 0.8% | | | |
| Critical Access Hospital | 0.1% | \$4,220,364 | (0.0%) - 0.2% | | | |
| G.I. Hemorrhage (377, 378, 379) | 0.3% | \$4,171,163 | 0.2% - 0.4% | | | |
| Anesthesia | 0.2% | \$3,125,456 | (0.1%) - 0.4% | | | |
| All Other Codes | 0.3% | \$609,393,928 | 0.1% - 0.5% | | | |
| Overall | 0.3% | \$1,032,490,823 | 0.2% - 0.4% | | | |

Table D6 lists the services with other errors and the associated paid claims error rate.

Table D6: Top 20 Other Errors: All Contractors

| D. D. GYODOG, D. G. GYODOG, D | Other Errors | | | | | |
|---|---------------------------|--------------------------------|---------------------------|--|--|--|
| Part B (HCPCS), DMEs (HCPCS), Part A excluding Inpatient Hospital PPS (Type of Bill), and Inpatient Hospital PPS (MS-DRG) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Home Health | 0.1% | \$27,283,406 | (0.1%) - 0.4% | | | |
| Hospital Inpatient (Part A) | 0.2% | \$18,694,891 | (0.2%) - 0.6% | | | |
| Office visits - established | 0.1% | \$12,323,804 | (0.0%) - 0.2% | | | |
| Anesthesia | 0.5% | \$10,097,332 | 0.5% - 0.6% | | | |
| Nonhospital based hospice | 0.1% | \$9,445,096 | (0.0%) - 0.2% | | | |
| All Policy Groups with Less than 30 Claims | 0.7% | \$8,350,113 | (0.4%) - 1.8% | | | |
| Minor procedures - other (Medicare fee schedule) | 0.2% | \$7,571,516 | (0.0%) - 0.4% | | | |
| Office visits - new | 0.6% | \$6,854,122 | (0.1%) - 1.2% | | | |
| SNF Inpatient | 0.0% | \$6,843,386 | (0.0%) - 0.1% | | | |
| Chiropractic | 1.2% | \$6,795,742 | (1.0%) - 3.3% | | | |
| Heart Failure & Shock (291, 292, 293) | 0.1% | \$5,409,851 | (0.1%) - 0.4% | | | |
| Chest Pain (313) | 0.6% | \$5,153,579 | (0.6%) - 1.9% | | | |
| Support Surfaces | 4.4% | \$3,663,597 | (4.0%) - 12.9% | | | |
| SNF Outpatient | 2.0% | \$3,637,012 | 1.4% - 2.6% | | | |
| Hospital Outpatient | 0.0% | \$3,591,864 | (0.0%) - 0.0% | | | |
| Diabetic Shoes | 1.0% | \$2,615,910 | (0.4%) - 2.5% | | | |
| Urological Supplies | 1.7% | \$2,602,072 | (1.6%) - 4.9% | | | |
| Oxygen Supplies/Equipment | 0.1% | \$2,162,195 | (0.1%) - 0.3% | | | |
| Glucose Monitor | 0.1% | \$1,939,290 | (0.0%) - 0.3% | | | |
| Ambulatory procedures - skin | 0.1% | \$1,751,604 | (0.1%) - 0.3% | | | |
| All Other Codes | 0.0% | \$19,667,470 | 0.0% - 0.0% | | | |
| Overall | 0.1% | \$166,453,851 | 0.0% - 0.1% | | | |

Appendix E: Projected Improper Payments by Type of Service for Claim Type (Details)

Appendix E displays the paid claims error rate (and projected improper payment amount) by service category for each claim type: part B, DME, Part A (excluding inpatient hospital PPS) and Part A (Inpatient hospital PPS). Each table is sorted by projected improper payments from highest to lowest. All estimates are based on a minimum of 30 claims in the sample.

Table E1: Paid Claims Error Rates by Service Type: Part B

| Table E1. I ald Claims E1101 Rat | Paid Claims Error Rate | | | | | | |
|---|------------------------|-------------------------------------|-----------------------------------|-------------------|-------------------------------|--|--|
| Service Types Billed to Part B (BETOS) | Error Rate | Number of Line Items (Sample) | Projected Improper Payments | Standard Error | 95% Confidence Interval | | |
| Office visits - established | 12.3% | 8,300 | \$1,475,533,109 | 0.5% | 11.4% - 13.2% | | |
| Hospital visit - subsequent | 20.5% | 1,736 | \$1,099,101,902 | 1.8% | 17.0% - 23.9% | | |
| Minor procedures - other (Medicare fee schedule) | 18.1% | 2,047 | \$686,424,679 | 1.6% | 14.9% - 21.2% | | |
| Consultations | 23.3% | 935 | \$670,743,182 | 1.3% | 20.9% - 25.8% | | |
| Lab tests - other (non-Medicare fee schedule) | 19.9% | 3,660 | \$561,377,980 | 2.6% | 14.7% - 25.1% | | |
| Hospital visit - initial | 28.2% | 480 | \$481,856,709 | 2.1% | 24.1% - 32.4% | | |
| Other drugs | 8.4% | 928 | \$436,214,485 | 2.6% | 3.4% - 13.5% | | |
| Nursing home visit | 21.7% | 822 | \$346,166,960 | 1.8% | 18.0% - 25.3% | | |
| Office visits - new | 24.0% | 650 | \$292,486,069 | 1.8% | 20.4% - 27.5% | | |
| Specialist - psychiatry | 27.7% | 635 | \$276,156,504 | 4.3% | 19.4% - 36.1% | | |
| Chiropractic | 43.9% | 743 | \$256,897,088 | 2.9% | 38.3% - 49.6% | | |
| Chemotherapy | 19.8% | 83 | \$251,015,056 | 8.8% | 2.6% - 37.1% | | |
| All Codes With Less Than 30 Claims | 8.3% | 284 | \$237,032,598 | 4.6% | (0.7%) - 17.4% | | |
| Oncology - radiation therapy | 10.6% | 137 | \$216,614,872 | 3.9% | 3.0% - 18.1% | | |
| Ambulance | 4.1% | 583 | \$205,210,656 | 0.9% | 2.4% - 5.7% | | |
| Advanced imaging - CAT/CT/CTA: other | 16.0% | 411 | \$196,933,783 | 3.2% | 9.7% - 22.3% | | |
| Echography/ultrasonography - heart | 16.7% | 331 | \$185,481,483 | 3.1% | 10.7% - 22.8% | | |
| Lab tests - other (Medicare fee schedule) | 8.1% | 647 | \$182,305,995 | 1.5% | 5.3% - 11.0% | | |
| Emergency room visit | 9.4% | 751 | \$181,297,441 | 1.1% | 7.3% - 11.5% | | |
| Other tests - other | 14.7% | 573 | \$177,613,915 | 2.0% | 10.8% - 18.7% | | |
| Specialist - opthamology | 7.1% | 1,003 | \$163,438,427 | 1.0% | 5.1% - 9.2% | | |
| Hospital visit - critical care | 19.4% | 136 | \$163,423,090 | 3.7% | 12.1% - 26.6% | | |
| Minor procedures - musculoskeletal | 16.0% | 444 | \$142,157,680 | 2.4% | 11.2% - 20.7% | | |
| Standard imaging - nuclear medicine | 10.7% | 239 | \$130,865,845 | 1.7% | 7.4% - 14.0% | | |
| Major procedure - Other | 11.6% | 111 | \$118,997,875 | 1.8% | 8.0% - 15.1% | | |
| Standard imaging - musculoskeletal | 19.1% | 989 | \$101,277,400 | 2.3% | 14.6% - 23.6% | | |
| Advanced imaging - MRI/MRA: other | 7.9% | 190 | \$94,994,807 | 3.3% | 1.6% - 14.3% | | |
| Advanced imaging - CAT/CT/CTA: brain/head/neck | 22.8% | 244 | \$90,391,243 | 7.1% | 8.9% - 36.7% | | |
| Minor procedures - skin | 7.4% | 681 | \$78,908,580 | 1.5% | 4.5% - 10.3% | | |
| Oncology - other | 20.4% | 142 | \$77,198,858 | 4.0% | 12.5% - 28.2% | | |

| | Paid Claims Error Rate | | | | | | |
|--|------------------------|-------------------------------------|-----------------------------------|-------------------|-------------------------------|--|--|
| Service Types Billed to Part B (BETOS) | Error Rate | Number of Line Items (Sample) | Projected Improper Payments | Standard Error | 95% Confidence Interval | | |
| Standard imaging - chest | 15.4% | 1,439 | \$71,300,501 | 1.6% | 12.2% - 18.6% | | |
| Lab tests - blood counts | 21.3% | 1,353 | \$70,127,196 | 1.4% | 18.6% - 24.0% | | |
| Dialysis services (Medicare Fee Schedule) | 8.5% | 171 | \$69,844,209 | 1.9% | 4.7% - 12.2% | | |
| Other tests - electrocardiograms | 18.4% | 1,145 | \$69,386,568 | 1.7% | 15.1% - 21.7% | | |
| Anesthesia | 3.7% | 538 | \$68,394,174 | 0.9% | 1.8% - 5.5% | | |
| Specialist - other | 29.8% | 1,754 | \$67,031,682 | 6.3% | 17.4% - 42.1% | | |
| Endoscopy - upper gastrointestinal | 15.5% | 111 | \$66,403,143 | 4.9% | 5.9% - 25.0% | | |
| Lab tests - automated general profiles | 16.9% | 1,423 | \$63,394,256 | 1.4% | 14.3% - 19.6% | | |
| Major procedure, cardiovascular-Other | 6.9% | 111 | \$62,155,214 | 2.0% | 3.1% - 10.8% | | |
| Endoscopy - colonoscopy | 6.3% | 161 | \$61,452,625 | 1.5% | 3.5% - 9.2% | | |
| Ambulatory procedures - skin | 3.0% | 554 | \$54,869,154 | 0.7% | 1.6% - 4.5% | | |
| Imaging/procedure - other | 20.2% | 209 | \$54,355,313 | 6.6% | 7.3% - 33.1% | | |
| Echography/ultrasonography - other | 9.9% | 294 | \$48,908,474 | 2.7% | 4.6% - 15.1% | | |
| Other tests - EKG monitoring | 21.3% | 122 | \$47,153,470 | 3.8% | 13.8% - 28.8% | | |
| Ambulatory procedures - other | 7.3% | 355 | \$47,124,975 | 1.7% | 3.9% - 10.6% | | |
| Echography/ultrasonography - carotid arteries | 15.0% | 124 | \$45,488,929 | 4.6% | 6.0% - 23.9% | | |
| Echography/ultrasonography - abdomen/pelvis | 12.4% | 193 | \$41,584,679 | 3.0% | 6.5% - 18.3% | | |
| Standard imaging - other | 13.8% | 259 | \$40,427,458 | 3.8% | 6.4% - 21.3% | | |
| Lab tests - routine venipuncture (non Medicare | 10.00/ | 2.400 | ¢21 (21 97) | 1 10/ | | | |
| fee schedule) | 19.0% | 2,489 | \$31,621,876 | 1.1% | 16.9% - 21.1% | | |
| Eye procedure - cataract removal/lens insertion | | | \$30,551,202 | 1.2% | | | |
| Home visit | 9.6% | 81 | \$27,880,028 | 2.1% | 5.5% - 13.8% | | |
| Standard imaging - contrast gastrointestinal | 20.2% | 79 | \$27,767,334 | 10.0% | 0.6% - 39.7% | | |
| Other - Medicare fee schedule | 15.0% | 175 | \$25,401,820 | 5.0% | 5.1% - 24.8% | | |
| Eye procedure - other | 2.7% | 150 | \$22,090,941 | 0.8% | 1.1% - 4.2% | | |
| Advanced imaging - MRI/MRA: brain/head/neck Imaging/procedure - heart including cardiac catheter | 5.6% | 78 45 | \$20,050,652 \$19,561,167 | 6.1% | 3.3% - 7.9% 4.2% - 27.9% | | |
| Prosthestic/Orthotic devices | 11.7% | 75 | \$16,428,145 | 8.3% | (4.6%) - 28.0% | | |
| Other - non-Medicare fee schedule | 27.8% | 255 | \$16,045,377 | 4.9% | 18.1% - 37.5% | | |
| Standard imaging - breast | 4.9% | 232 | \$15,470,193 | 3.1% | (1.3%) - 11.0% | | |
| Other tests - cardiovascular stress tests | 6.0% | 116 | \$12,495,219 | 1.2% | 3.6% - 8.5% | | |
| Lab tests - urinalysis | 15.8% | 762 | \$10,111,859 | 1.7% | 12.6% - 19.1% | | |
| Lab tests - bacterial cultures | 7.8% | 225 | \$6,970,217 | 1.6% | 4.6% - 11.0% | | |
| Ambulatory procedures - musculoskeletal | 2.9% | 34 | \$6,622,653 | 0.3% | 2.4% - 3.5% | | |
| Echography/ultrasonography - eye | 5.7% | 89 | \$5,998,555 | 1.3% | 3.0% - 8.3% | | |
| Endoscopy - cystoscopy | 2.1% | 70 | \$5,315,202 | 1.5% | (0.8%) - 5.0% | | |
| Immunizations/Vaccinations | 1.3% | 504 | \$4,599,723 | 0.4% | 0.6% - 2.0% | | |
| Lab tests - glucose | 9.9% | 219 | \$2,607,145 | 2.6% | 4.8% - 15.0% | | |
| Endoscopy - other | 2.4% | 33 | \$2,527,572 | 0.5% | 1.4% - 3.4% | | |
| Major procedure, orthopedic - other | 0.2% | 37 | \$1,682,387 | 0.0% | 0.1% - 0.2% | | |
| Undefined codes | N/A | 707 | ψ1,002,307 N/A | N/A | N/A | | |
| All Type of Services (Incl. Codes Not Listed) | 12.9% | 30,965 | \$10,939,319,559 | 0.4% | 12.1% - 13.8% | | |

Table E2: Paid Claims Error Rates by Service Type: DME

| | Paid Claims Error Rate | | | | | | |
|---|------------------------|-------------------------------------|-----------------------------------|-------------------|-------------------------------|--|--|
| Service Types Billed to DMEs | Error Rate | Number of Line Items (Sample) | Projected Improper Payments | Standard Error | 95% Confidence Interval | | |
| Oxygen Supplies/Equipment | 75.1% | 2,501 | \$1,227,041,101 | 1.1% | 72.8% - 77.3% | | |
| Glucose Monitor | 85.9% | 2,743 | \$1,114,010,346 | 1.0% | 84.0% - 87.8% | | |
| Wheelchairs Motorized | 92.6% | 51 | \$822,105,083 | 3.4% | 86.0% - 99.3% | | |
| All Policy Groups with Less than 30 Claims | 56.9% | 310 | \$655,689,620 | 6.5% | 44.1% - 69.7% | | |
| Nebulizers & Related Drugs | 67.6% | 1,648 | \$457,143,231 | 4.2% | 59.3% - 75.8% | | |
| CPAP | 67.6% | 968 | \$336,863,306 | 2.6% | 62.6% - 72.7% | | |
| Immunosuppressive Drugs | 62.8% | 193 | \$270,032,267 | 5.4% | 52.1% - 73.5% | | |
| Enteral Nutrition | 68.5% | 266 | \$266,995,082 | 4.4% | 60.0% - 77.1% | | |
| Wheelchairs Options/Accessories | 90.0% | 348 | \$265,939,233 | 5.4% | 79.4% -100.5% | | |
| Infusion Pumps & Related Drugs | 80.9% | 136 | \$265,723,050 | 8.0% | 65.1% - 96.6% | | |
| Wheelchairs Manual | 90.6% | 745 | \$211,846,705 | 2.7% | 85.3% - 96.0% | | |
| Lower Limb Orthoses | 67.2% | 152 | \$193,528,373 | 9.2% | 49.3% - 85.2% | | |
| Diabetic Shoes | 77.4% | 192 | \$193,431,651 | 3.7% | 70.1% - 84.7% | | |
| Hospital Beds/Accessories | 86.7% | 448 | \$169,594,758 | 1.8% | 83.1% - 90.3% | | |
| Surgical Dressings | 76.4% | 167 | \$146,760,612 | 8.1% | 60.7% - 92.2% | | |
| Ostomy Supplies | 61.9% | 235 | \$100,059,705 | 5.5% | 51.0% - 72.7% | | |
| Respiratory Assist Device | 61.7% | 120 | \$77,592,020 | 5.8% | 50.3% - 73.2% | | |
| Support Surfaces | 73.6% | 104 | \$60,652,179 | 7.7% | 58.5% - 88.6% | | |
| Urological Supplies | 38.3% | 212 | \$59,524,108 | 8.8% | 21.0% - 55.6% | | |
| Walkers | 72.7% | 195 | \$51,083,922 | 4.2% | 64.4% - 80.9% | | |
| TENS | 95.1% | 101 | \$48,690,783 | 2.6% | 90.1% -100.1% | | |
| LSO | 51.7% | 30 | \$42,569,869 | 13.9% | 24.4% - 78.9% | | |
| Commodes/Bed Pans/Urinals | 91.1% | 109 | \$40,537,713 | 3.8% | 83.6% - 98.6% | | |
| Upper Limb Orthoses | 53.6% | 88 | \$34,805,873 | 10.1% | 33.8% - 73.5% | | |
| Wheelchairs Seating | 84.7% | 61 | \$34,728,521 | 7.1% | 70.9% - 98.5% | | |
| Lenses | 32.9% | 148 | \$20,906,367 | 5.5% | 22.2% - 43.7% | | |
| Patient Lift | 88.9% | 43 | \$18,761,064 | 4.5% | 80.1% - 97.7% | | |
| Orthopedic Footwear | 100.0% | 46 | \$15,260,104 | 0.0% | 100.0% -100.0% | | |
| Breast Prostheses | 31.8% | 37 | \$14,575,736 | 9.3% | 13.7% - 50.0% | | |
| Suction Pump | 70.3% | 54 | \$10,319,605 | 10.0% | 50.7% - 89.9% | | |
| Repairs/DME | 92.5% | 51 | \$10,249,880 | 3.4% | 85.9% - 99.2% | | |
| Tracheostomy Supplies | 52.8% | 30 | \$9,617,209 | 11.4% | 30.4% - 75.2% | | |
| Canes/Crutches | 63.5% | 55 | \$4,753,671 | 8.3% | 47.3% - 79.7% | | |
| Dialysis Supplies & Equipment | N/A | 46 | N/A | N/A | N/A | | |
| Routinely Denied Items | N/A | 108 | N/A | N/A | N/A | | |
| All Type of Services (Incl. Codes Not Listed) | 73.8% | 11,996 | \$7,251,392,747 | 1.2% | 71.5% - 76.1% | | |

Table E3: Paid Claims Error Rates by Service Type: Part A excluding Inpatient Hospital PPS

| | | | Paid Claims Error | Rate | |
|---|---------------|-------------------------------------|-----------------------------------|-------------------|-------------------------------|
| Service Types Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Error Rate | Number of Line Items (Sample) | Projected Improper Payments | Standard Error | 95% Confidence Interval |
| Hospital Outpatient | 5.3% | 19,931 | \$1,530,148,047 | 0.4% | 4.6% - 6.1% |
| Home Health | 4.8% | 1,656 | \$995,517,962 | 0.6% | 3.6% - 6.0% |
| SNF Inpatient | 3.3% | 1,055 | \$772,666,256 | 0.7% | 1.9% - 4.6% |
| Clinic ESRD | 3.9% | 715 | \$298,310,567 | 0.8% | 2.3% - 5.5% |
| Nonhospital based hospice | 2.4% | 788 | \$269,121,243 | 0.7% | 1.0% - 3.7% |
| Critical Access Hospital | 5.3% | 2,756 | \$214,648,018 | 0.9% | 3.5% - 7.1% |
| Hospital Inpatient (Part A) | 2.1% | 306 | \$183,380,391 | 0.3% | 1.5% - 2.7% |
| SNF Inpatient Part B | 7.6% | 521 | \$125,708,426 | 1.6% | 4.4% - 10.7% |
| Hospital Other Part B | 27.3% | 3,260 | \$117,971,251 | 1.6% | 24.0% - 30.5% |
| Hospital based hospice | 3.8% | 111 | \$54,215,716 | 2.0% | (0.2%) - 7.7% |
| Hospital Inpatient Part B | 11.2% | 115 | \$44,515,938 | 5.5% | 0.4% - 22.0% |
| Clinic – Freestanding (Effective April 1, 2010) | 6.9% | 636 | \$32,477,464 | 1.2% | 4.5% - 9.3% |
| Clinic OPT | 5.2% | 453 | \$32,407,925 | 1.4% | 2.5% - 8.0% |
| SNF Outpatient | 13.3% | 101 | \$24,628,531 | 2.0% | 9.3% - 17.2% |
| Clinic CORF | 10.2% | 115 | \$20,528,731 | 4.4% | 1.6% - 18.9% |
| Hospital Swing Bed | 1.2% | 51 | \$13,928,431 | 0.2% | 0.7% - 1.6% |
| Clinical Rural Health | 2.3% | 1,721 | \$13,853,420 | 0.4% | 1.5% - 3.1% |
| Community Mental Health Centers | 0.5% | 96 | \$1,598,668 | 0.3% | (0.0%) - 1.0% |
| All Codes With Less Than 30 Claims | 0.0% | 4 | N/A | N/A | N/A |
| Home Health (Part B Only) | 0.0% | 67 | N/A | N/A | N/A |
| All Type of Services (Incl. Codes Not Listed) | 4.2% | 34,458 | \$4,745,626,984 | 0.3% | 3.7% - 4.7% |

Table E4: Paid Claims Error Rates by Service Type: Part A Inpatient Hospital PPS

| Table E4: Paid Claims Error Rau | | vice Typer | Paid Claims Error | | |
|---|---------------|-------------------------------------|-----------------------------------|-------------------|-------------------------------|
| PPS Acute Care Hospital Service Types Billed to Inpatient Hospital PPS (MS- DRG Groups) | Error Rate | Number of Line Items (Sample) | Projected Improper Payments | Standard Error | 95% Confidence Interval |
| All Codes With Less Than 30 Claims | 9.1% | 1,267 | \$6,883,073,837 | 1.1% | 6.8% - 11.3% |
| Major Joint Replacement Or Reattachment Of | | | | | |
| Lower Extremity (469, 470) | 24.3% | 103 | \$1,416,348,286 | 4.2% | 16.2% - 32.5% |
| Permanent Cardiac Pacemaker Implant (242, 243, 244) | 47.2% | 33 | \$988,741,766 | 3.1% | 41.2% - 53.3% |
| Perc Cardiovasc Proc W Drug-Eluting Stent (246 | 47.270 | 33 | \$300,741,700 | 3.170 | 41.270 - 33.370 |
| , 247) | 17.1% | 40 | \$385,315,015 | 6.1% | 5.1% - 29.1% |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours | | | | | |
| (871, 872) | 5.1% | 78 | \$247,989,539 | 1.4% | 2.5% - 7.8% |
| Chest Pain (313) | 20.9% | 49 | \$168,421,077 | 6.0% | 9.2% - 32.5% |
| G.I. Hemorrhage (377, 378, 379) | 9.9% | 44 | \$149,527,576 | 1.8% | 6.3% - 13.5% |
| Major Small & Large Bowel Procedures (329, 330, 331) | 6.6% | 34 | \$149,091,352 | 3.9% | (1.0%) - 14.2% |
| Respiratory Infections & Inflammations (177, 178, 179) | 6.4% | 43 | \$138,235,571 | 0.3% | 5.8% - 7.0% |
| Esophagitis, Gastroent & Misc Digest Disorders (391, 392) | 12.6% | 49 | \$135,111,217 | 1.0% | 10.5% - 14.6% |
| Kidney & Urinary Tract Infections (689, 690) | 9.6% | 59 | \$117,843,881 | 4.4% | 1.0% - 18.3% |
| Nutritional & Misc Metabolic Disorders (640, 641) | 9.7% | 63 | \$115,574,973 | 1.6% | 6.5% - 12.8% |
| Renal Failure (682, 683, 684) | 4.5% | 49 | \$86,143,600 | 1.0% | 2.7% - 6.4% |
| Syncope & Collapse (312) | 11.2% | 38 | \$74,323,384 | 1.7% | 7.9% - 14.5% |
| Heart Failure & Shock (291, 292, 293) | 1.6% | 120 | \$72,755,513 | 0.8% | 0.1% - 3.1% |
| Cardiac Arrhythmia & Conduction Disorders (308, 309, 310) | 4.4% | 67 | \$64,116,976 | 1.4% | 1.5% - 7.2% |
| Simple Pneumonia & Pleurisy (193, 194, 195) | 2.4% | 71 | \$62,310,615 | 0.9% | 0.6% - 4.2% |
| Acute Myocardial Infarction, Discharged Alive (280, 281, 282) | 4.9% | 35 | \$53,990,166 | 2.9% | (0.8%) - 10.6% |
| Chronic Obstructive Pulmonary Disease (190, 191, 192) | 0.4% | 76 | \$8,601,782 | 0.0% | 0.4% - 0.5% |
| Hip & Femur Procedures Except Major Joint (480 , 481 , 482) | 0.4% | 36 | \$7,780,135 | 0.2% | 0.1% - 0.7% |
| Intracranial Hemorrhage Or Cerebral Infarction (064, 065, 066) | 0.4% | 52 | \$7,029,328 | 0.2% | (0.1%) - 0.9% |
| Legacy DRG Claims | 0.0% | 47 | N/A | N/A | N/A |
| All Type of Services (Incl. Codes Not Listed) | 9.5% | 2,453 | \$11,332,325,591 | 0.9% | 7.8% - 11.2% |

Appendix F: Projected Improper Payments by Provider Type for each Claim Type (Details)

Appendix F presents error rates by provider type. The tables include the top provider types based on improper payments for providers that bill each type of contractor. All estimates are based on a minimum of 30 lines in the sample. This series of tables is sorted in descending order by projected improper payments.

The CERT program is unable to calculate provider compliance error rates for FIs/Part A MACs due to systems limitations.

Table F1: Error Rates and Improper Payments by Provider Type: Part B

| Papie F1: Error Rate | | Paid Claim | | | |
|---|---------------|--------------------------------|-------------------|----------------------------|-----------------------------------|
| Provider Types Billing to Part B | Error Rate | Projected Improper Payments | Sampled Claims | 95% Confidence Interval | Provider Compliance Error Rate |
| Internal Medicine | 18.1% | \$1,692,839,881 | 4,107 | 15.7% - 20.5% | 26.5% |
| Cardiology | 18.0% | \$1,078,731,956 | 2,116 | 14.9% - 21.0% | 27.7% |
| Family Practice | 17.5% | \$823,994,663 | 2,969 | 14.7% - 20.3% | 29.7% |
| Clinical Laboratory (Billing Independently) | 16.0% | \$631,837,929 | 2,910 | 11.8% - 20.2% | 21.7% |
| Diagnostic Radiology | 14.3% | \$544,373,668 | 2,920 | 10.8% - 17.8% | 22.8% |
| Hematology/Oncology | 12.9% | \$460,343,064 | 514 | 4.5% - 21.4% | 19.2% |
| Physical Therapist in Private Practice | 19.4% | \$361,482,013 | 763 | 15.6% - 23.3% | 25.2% |
| Orthopedic Surgery | 12.9% | \$337,684,695 | 703 | 8.9% - 17.0% | 30.2% |
| Chiropractic | 43.9% | \$256,897,088 | 767 | 38.3% - 49.6% | 55.0% |
| Radiation Oncology | 11.4% | \$254,727,402 | 177 | 3.5% - 19.4% | 13.5% |
| Emergency Medicine | 11.3% | \$247,515,199 | 757 | 8.2% - 14.4% | 17.4% |
| Ophthalmology | 4.7% | \$232,668,590 | 1,154 | 3.3% - 6.1% | 15.2% |
| Neurology | 18.7% | \$231,574,099 | 343 | 13.0% - 24.4% | 26.4% |
| Gastroenterology | 14.2% | \$215,400,714 | 400 | 9.9% - 18.6% | 18.8% |
| General Surgery | 10.2% | \$207,172,940 | 435 | 6.8% - 13.5% | 18.0% |
| Ambulance Service Supplier (e.g., private ambulance companies, funeral homes) | 4.1% | \$205,210,656 | 583 | 2.4% - 5.7% | 11.4% |
| Rheumatology | 25.4% | \$195,502,581 | 168 | 6.8% - 44.0% | 28.7% |
| Nephrology | 11.9% | \$192,724,631 | 421 | 8.6% - 15.3% | 18.2% |
| Pulmonary Disease | 14.7% | \$181,621,163 | 409 | 9.3% - 20.0% | 28.4% |
| Podiatry | 12.0% | \$178,941,032 | 819 | 8.6% - 15.3% | 19.9% |
| Urology | 10.4% | \$169,261,201 | 511 | 6.8% - 14.1% | 17.6% |
| Obstetrics/Gynecology | 25.2% | \$165,736,210 | 249 | 5.9% - 44.5% | 29.6% |
| Medical Oncology | 11.2% | \$162,770,786 | 206 | 7.0% - 15.4% | 23.7% |
| Thoracic Surgery | 32.2% | \$160,889,897 | 38 | 31.9% - 32.6% | 33.5% |
| Psychiatry | 17.7% | \$156,371,491 | 422 | 12.5% - 23.0% | 27.8% |
| Anesthesiology | 7.8% | \$111,434,955 | 429 | 4.7% - 10.9% | 21.1% |
| Nurse Practitioner | 13.4% | \$108,074,933 | 680 | 9.7% - 17.2% | 21.7% |
| Pathology | 11.4% | \$107,310,765 | 406 | 7.2% - 15.6% | 20.4% |
| Physical Medicine and | 13.0% | \$106,533,621 | 260 | 8.8% - 17.2% | 22.1% |

| Duanidan Tamas Dillina 4a | | Paid Claim | Duanidan Camulianaa | | |
|---|---------------|--------------------------------|---------------------|----------------------------|-----------------------------------|
| Provider Types Billing to Part B | Error Rate | Projected Improper Payments | Sampled Claims | 95% Confidence Interval | Provider Compliance Error Rate |
| Rehabilitation | | • | | | |
| Otolaryngology | 15.9% | \$104,873,592 | 265 | 8.3% - 23.5% | 29.2% |
| Clinical Psychologist | 30.4% | \$103,992,333 | 138 | 13.7% - 47.1% | 34.2% |
| Dermatology | 4.4% | \$95,385,607 | 575 | 2.8% - 5.9% | 9.6% |
| General Practice | 13.1% | \$86,699,710 | 294 | 8.4% - 17.9% | 24.7% |
| Clinical Social Worker | 41.1% | \$76,029,416 | 140 | 20.9% - 61.2% | 40.5% |
| Endocrinology | 20.5% | \$75,738,415 | 143 | 9.7% - 31.2% | 32.7% |
| Infectious Disease | 8.0% | \$65,658,731 | 117 | 5.3% - 10.7% | 13.8% |
| All Provider Types With Less Than 30 Claims | 5.2% | \$59,760,401 | 327 | 3.3% - 7.0% | 26.0% |
| Physician Assistant | 9.8% | \$59,414,588 | 421 | 6.2% - 13.3% | 19.3% |
| Ambulatory Surgical Center | 2.4% | \$55,538,292 | 186 | 0.5% - 4.3% | 10.1% |
| Optometry | 8.3% | \$53,012,599 | 369 | 5.5% - 11.0% | 18.4% |
| Vascular Surgery | 11.2% | \$47,200,702 | 115 | 8.0% - 14.5% | 24.8% |
| Critical Care (Intensivists) | 15.8% | \$37,630,305 | 47 | 9.0% - 22.5% | 21.6% |
| Occupational Therapist in Private Practice | 27.6% | \$31,959,852 | 54 | 20.4% - 34.7% | 34.9% |
| Portable X-Ray Supplier (Billing Independently) | 14.4% | \$29,500,431 | 98 | 3.1% - 25.7% | 30.1% |
| Allergy/Immunology | 16.8% | \$29,383,314 | 113 | 8.3% - 25.2% | 22.4% |
| Plastic and Reconstructive Surgery | 10.1% | \$25,909,233 | 46 | 6.2% - 13.9% | 24.2% |
| Neurosurgery | 2.8% | \$25,901,344 | 92 | 1.0% - 4.6% | 17.5% |
| Interventional Pain Management | 11.7% | \$23,410,192 | 80 | 7.0% - 16.5% | 23.7% |
| Independent Diagnostic Testing Facility (IDTF) | 2.3% | \$20,610,678 | 140 | 0.1% - 4.6% | 25.4% |
| Geriatric Medicine | 9.3% | \$17,200,704 | 71 | 7.4% - 11.2% | 13.7% |
| Certified Registered Nurse Anesthetist (CRNA) | 2.2% | \$16,090,328 | 257 | 1.2% - 3.1% | 11.6% |
| Interventional Radiology | 6.8% | \$9,532,918 | 69 | 5.6% - 7.9% | 4.1% |
| Audiologist (Billing | 10.20/ | ¢5 275 201 | 20 | 11.60/ 24.70/ | 17.00/ |
| Independently) | 18.2% | \$5,375,201 | 30 | 11.6% - 24.7% | 17.9% |
| Pediatric Medicine Mass Immunization Roster Billers (Mass Immunizers have to roster bill assigned claims and can only bill for | 5.6% | \$3,882,849 | 38 | 4.8% - 6.3% | 14.5% |
| immunizations) | 0.0% | \$0 | 138 | 0.0% - 0.0% | 10.9% |
| All Provider Types | 12.9% | \$10,939,319,559 | 30,965 | 12.1% - 13.8% | 22.0% |

Table F2: Error Rates and Improper Payments by Provider Type: DME

| Table F2: Error Rates and Improper Payments by Provider Type: DIVIE | | | | | | | | | | | |
|---|---------------|-----------------------------------|-------------------|----------------------------|-----------------------------------|--|--|--|--|--|--|
| | | Paid Claim | | | | | | | | | |
| Provider Types Billing to DME | Error Rate | Projected Improper Payments | Sampled Claims | 95% Confidence Interval | Provider Compliance Error Rate | | | | | | |
| Medical supply company not included in 51, 52, or 53 | 76.0% | \$3,068,399,792 | 4,371 | 72.6% - 79.4% | 76.6% | | | | | | |
| Pharmacy | 74.8% | \$2,771,893,886 | 5,281 | 71.3% - 78.3% | 76.0% | | | | | | |
| Medical Supply Company with Respiratory Therapist | 73.8% | \$533,778,777 | 1,350 | 69.5% - 78.2% | 74.9% | | | | | | |
| Individual orthotic personnel certified by an accrediting organization | 92.2% | \$209,178,134 | 92 | 84.4% -100.1% | 92.7% | | | | | | |
| Medical supply company with prosthetic/orthotic personnel certified by an accrediting organization | 75.9% | \$176,835,353 | 85 | 50.3% -101.4% | 75.5% | | | | | | |
| All Provider Types With Less Than 30 Claims | 52.6% | \$113,334,840 | 201 | 34.4% - 70.8% | 76.8% | | | | | | |
| Unknown Supplier/Provider | 80.8% | \$97,262,771 | 162 | 68.3% - 93.3% | 81.3% | | | | | | |
| Podiatry | 59.1% | \$94,687,815 | 130 | 40.0% - 78.3% | 62.9% | | | | | | |
| Medical supply company with orthotic personnel certified by an accrediting organization | 66.5% | \$87,436,881 | 93 | 44.7% - 88.4% | 66.3% | | | | | | |
| Individual prosthetic personnel certified by an accrediting organization | 40.5% | \$70,433,124 | 45 | 14.3% - 66.7% | 41.5% | | | | | | |
| Orthopedic Surgery | 26.9% | \$9,990,612 | 59 | 4.1% - 49.7% | 46.2% | | | | | | |
| Optician | 45.2% | \$9,357,253 | 37 | 24.8% - 65.6% | 58.3% | | | | | | |
| Optometry | 37.7% | \$7,955,252 | 53 | 19.6% - 55.9% | 46.5% | | | | | | |
| Ophthalmology | 4.0% | \$848,258 | 37 | (1.4%) - 9.3% | 18.0% | | | | | | |
| All Provider Types | 73.8% | \$7,251,392,747 | 11,996 | 71.5% - 76.1% | 75.3% | | | | | | |

Table F3: Error Rates and Improper Payments by Provider Type: Part A excluding Inpatient Hospital PPS

| | | Paid Claims | Error Rate | |
|--|------------|--------------------------------|-------------------|----------------------------|
| Provider Types Billing to Part A (excluding Inpatient Hospital PPS) | Error Rate | Projected Improper Payments | Sampled Claims | 95% Confidence Interval |
| OPPS, Laboratory (an FI), Ambulatory (Billing an FI) | 5.5% | \$1,706,563,667 | 23,357 | 4.8% - 6.3% |
| ННА | 4.8% | \$995,517,962 | 1,723 | 3.6% - 6.0% |
| SNF | 3.6% | \$923,003,213 | 1,677 | 2.3% - 4.9% |
| Hospice | 2.5% | \$323,336,959 | 899 | 1.2% - 3.8% |
| ESRD | 3.9% | \$298,310,567 | 715 | 2.3% - 5.5% |
| Critical Access Hospital (CAH) Outpatient Services | 5.3% | \$214,648,018 | 2,756 | 3.5% - 7.1% |
| Inpatient Psychiatric Unit | 4.7% | \$105,776,060 | 80 | 2.6% - 6.8% |
| Inpatient Rehab Unit | 3.1% | \$74,766,789 | 46 | 2.3% - 4.0% |
| FQHC | 6.9% | \$32,477,464 | 636 | 4.5% - 9.3% |
| Outpatient Rehab Facility (ORF) | 5.2% | \$32,407,925 | 453 | 2.5% - 8.0% |
| Comprehensive Outpatient Rehab Facility (CORF) | 10.2% | \$20,528,731 | 115 | 1.6% - 18.9% |
| RHCs | 2.3% | \$13,853,420 | 1,721 | 1.5% - 3.1% |
| Inpatient Psychiatric Hospitals | 0.4% | \$2,837,543 | 37 | 0.3% - 0.5% |
| Community Mental Health Center (CMHC) | 0.5% | \$1,598,668 | 96 | (0.0%) - 1.0% |
| All Codes With Less Than 30 Claims | 0.0% | \$0 | 13 | 0.0% - 0.0% |
| Inpatient Critical Access Hospital | 0.0% | \$0 | 97 | 0.0% - 0.0% |
| Inpatient Rehabilitation Hospitals | 0.0% | \$0 | 37 | 0.0% - 0.0% |
| Overall | 4.2% | \$4,745,626,984 | 34,458 | 3.7% - 4.7% |

Table F4: Error Rates and Improper Payments by Provider Type: Part A Inpatient Hospital PPS

| Provider Types Billing to Part A Inpatient | Paid Claims Error Rate | | | | | | |
|--|------------------------|--------------------------------|-------------------|----------------------------|--|--|--|
| Hospital PPS | Error Rate | Projected Improper Payments | Sampled Claims | 95% Confidence Interval | | | |
| DRG Short Term | 9.8% | \$11,149,808,135 | 2,429 | 8.0% - 11.5% | | | |
| All Codes With Less Than 30 Claims | 3.6% | \$182,517,456 | 24 | (1.4%) - 8.6% | | | |
| Overall | 9.5% | \$11,332,325,591 | 2,453 | 7.8% - 11.2% | | | |

Appendix G – Error Rates and Type of Error by Provider Type for each Claim Type

Table G1: Paid Claims Error Rates by Provider Type and Type of Error: Part B

| | | - 114100 0 | s by Provider Type and Type of Error: Part B Type of Error | | | | | | |
|---|---------------------------------|-------------------------------------|---|-------------------------------|--------------------------------------|---------------------|-------|--|--|
| Provider Types Billed to Part B | Paid Claims Error Rate | Number of Claims in Sample | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other | | |
| Chiropractic | 43.9% | 767 | 0.0% | 39.5% | 57.1% | 0.7% | 2.6% | | |
| Clinical Social Worker | 41.1% | 140 | 1.9% | 56.9% | 41.2% | 0.0% | 0.0% | | |
| Thoracic Surgery | 32.2% | 38 | 0.0% | 95.6% | 0.0% | 4.4% | 0.0% | | |
| Clinical Psychologist | 30.4% | 138 | 3.8% | 81.8% | 12.2% | 2.2% | 0.0% | | |
| Occupational Therapist in Private Practice | 27.6% | 54 | 0.0% | 93.9% | 2.5% | 3.6% | 0.0% | | |
| Rheumatology | 25.4% | 168 | 0.2% | 26.7% | 65.3% | 7.7% | 0.0% | | |
| Obstetrics/Gynecology | 25.2% | 249 | 0.4% | 70.6% | 10.7% | 17.5% | 0.7% | | |
| Endocrinology | 20.5% | 143 | 3.2% | 63.1% | 2.9% | 30.9% | 0.0% | | |
| Physical Therapist in Private Practice | 19.4% | 763 | 0.1% | 92.2% | 4.0% | 2.4% | 1.2% | | |
| Neurology | 18.7% | 343 | 17.8% | 29.5% | 19.7% | 33.1% | 0.0% | | |
| Audiologist (Billing Independently) | 18.2% | 30 | 0.0% | 49.8% | 50.2% | 0.0% | 0.0% | | |
| Internal Medicine | 18.1% | 4,107 | 1.1% | 56.5% | 4.7% | 36.9% | 0.8% | | |
| Cardiology | 18.0% | 2,116 | 0.5% | 64.3% | 14.0% | 21.2% | 0.0% | | |
| Psychiatry | 17.7% | 422 | 1.9% | 51.8% | 9.8% | 36.2% | 0.2% | | |
| Family Practice | 17.5% | 2,969 | 1.5% | 55.4% | 4.0% | 39.2% | 0.0% | | |
| Allergy/Immunology Clinical Laboratory | 16.8% | 113 | 0.0% | 57.2% | 25.6% | 17.2% | 0.0% | | |
| (Billing Independently) | 16.0% | 2,910 | 0.8% | 59.3% | 35.5% | 4.0% | 0.4% | | |
| Otolaryngology Critical Care | 15.9% | 265 | 0.0% | 53.3% | 14.2% | 32.5% | 0.0% | | |
| (Intensivists) | 15.8% | 47 | 0.0% | 54.2% | 0.1% | 45.7% | 0.0% | | |
| Pulmonary Disease Portable X-Ray Supplier (Billing Independently) | 14.7% | 409 98 | 0.0% | 51.1% 80.7% | 8.2% 18.6% | 0.7% | 0.0% | | |
| Diagnostic Radiology | 14.4% | 2,920 | 1.3% | 78.1% | 20.5% | 0.7% | 0.0% | | |
| Gastroenterology | 14.2% | 400 | 0.0% | 63.6% | 7.4% | 29.0% | 0.0% | | |
| Nurse Practitioner | 13.4% | 680 | 3.5% | 68.9% | 0.7% | 26.9% | 0.0% | | |
| General Practice | 13.1% | 294 | 12.8% | 57.9% | 1.7% | 27.0% | 0.6% | | |
| Physical Medicine and Rehabilitation | 13.0% | 260 | 0.0% | 60.6% | 6.7% | 32.7% | 0.0% | | |
| Orthopedic Surgery | 12.9% | 703 | 0.0% | 68.7% | 5.4% | 25.1% | 0.8% | | |
| Hematology/Oncology | 12.9% | 514 | 0.2% | 79.5% | 6.5% | 13.8% | 0.0% | | |
| Podiatry | 12.0% | 819 | 2.0% | 61.5% | 16.3% | 19.1% | 1.2% | | |
| Nephrology | 11.9% | 421 | 2.4% | 54.0% | 1.6% | 42.0% | 0.0% | | |
| Interventional Pain Management | 11.7% | 80 | 0.0% | 60.8% | 18.4% | 6.5% | 14.3% | | |
| Radiation Oncology | 11.4% | 177 | 0.0% | 93.1% | 3.4% | 3.5% | 0.0% | | |
| Pathology | 11.4% | 406 | 0.2% | 79.7% | 19.1% | 1.1% | 0.0% | | |
| Emergency Medicine | 11.3% | 757 | 1.3% | 49.9% | 1.5% | 46.9% | 0.4% | | |
| Vascular Surgery | 11.2% | 115 | 4.6% | 57.5% | 2.6% | 35.3% | 0.0% | | |

| | | | | Туре | of Error | | |
|--|---------------------------------|-------------------------------------|---------------------|-------------------------------|--------------------------------------|---------------------|-------|
| Provider Types Billed to Part B | Paid Claims Error Rate | Number of Claims in Sample | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other |
| Medical Oncology | 11.2% | 206 | 8.2% | 78.3% | 7.7% | 5.8% | 0.0% |
| Urology | 10.4% | 511 | 0.2% | 66.9% | 5.2% | 25.2% | 2.4% |
| General Surgery | 10.2% | 435 | 0.0% | 47.6% | 10.5% | 41.9% | 0.0% |
| Plastic and Reconstructive Surgery | 10.1% | 46 | 0.0% | 38.2% | 0.8% | 61.0% | 0.0% |
| Physician Assistant | 9.8% | 421 | 2.2% | 60.0% | 3.9% | 34.0% | 0.0% |
| Geriatric Medicine | 9.3% | 71 | 0.0% | 3.0% | 0.0% | 97.0% | 0.0% |
| Optometry | 8.3% | 369 | 2.7% | 47.9% | 11.3% | 38.2% | 0.0% |
| Infectious Disease | 8.0% | 117 | 0.0% | 47.4% | 0.0% | 52.6% | 0.0% |
| Anesthesiology | 7.8% | 429 | 0.0% | 67.6% | 13.1% | 10.2% | 9.1% |
| Interventional Radiology | 6.8% | 69 | 8.9% | 80.9% | 3.4% | 6.8% | 0.0% |
| Pediatric Medicine All Provider Types With | 5.6% | 38 | 0.0% | 56.1% | 0.1% | 43.8% | 0.0% |
| Less Than 30 Claims | 5.2% | 327 | 0.0% | 61.5% | 3.8% | 34.7% | 0.0% |
| Ophthalmology | 4.7% | 1,154 | 0.2% | 74.9% | 4.9% | 20.1% | 0.0% |
| Dermatology | 4.4% | 575 | 5.8% | 63.2% | 1.9% | 26.2% | 2.9% |
| Ambulance Service Supplier (e.g., private ambulance companies, funeral homes) | 4.1% | 583 | 7.3% | 19.5% | 62.2% | 11.0% | 0.0% |
| Neurosurgery | 2.8% | 92 | 0.0% | 33.1% | 0.0% | 66.9% | 0.0% |
| Ambulatory Surgical Center | 2.4% | 186 | 0.0% | 52.8% | 43.6% | 3.6% | 0.0% |
| Independent Diagnostic Testing Facility (IDTF) | 2.3% | 140 | 0.0% | 68.4% | 31.6% | 0.0% | 0.0% |
| Certified Registered Nurse Anesthetist (CRNA) | 2.2% | 257 | 0.0% | 84.7% | 0.0% | 15.3% | 0.0% |
| Mass Immunization Roster Billers (Mass Immunizers have to roster bill assigned claims and can only bill for immunizations) | 0.0% | 138 | N/A | N/A | N/A | N/A | N/A |
| All Provider Types | 12.9% | 30,965 | 1.5% | 61.8% | 13.2% | 22.9% | 0.5% |

Table G2: Paid Claims Error Rates by Provider Type and Type of Error: DME

| Table G2: Pald Cl | laims Error Rates by Provider Type and Type of Error: DME | | | | | | | |
|---|---|-------------------------------------|---------------------|-------------------------------|--------------------------------------|---------------------|-------|--|
| | | | | Type | of Error | | | |
| Provider Types Billed to DME | Paid Claims Error Rate | Number of Claims in Sample | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other | |
| Individual orthotic | | | | | | | | |
| personnel certified by an | | | | | | | | |
| accrediting organization | 92.2% | 92 | 0.4% | 63.4% | 36.1% | 0.1% | 0.0% | |
| Unknown Supplier/Provider | 80.8% | 162 | 0.0% | 58.6% | 41.2% | 0.0% | 0.1% | |
| Medical supply company | 00.070 | 102 | 0.070 | 36.070 | 41.270 | 0.070 | 0.170 | |
| not included in 51, 52, or | | | | | | | | |
| 53 | 76.0% | 4,371 | 0.9% | 61.7% | 37.0% | 0.1% | 0.2% | |
| Medical supply company with prosthetic/orthotic personnel certified by an | | | | | | | | |
| accrediting organization | 75.9% | 85 | 0.0% | 37.8% | 62.2% | 0.0% | 0.0% | |
| Pharmacy | 74.8% | 5,281 | 1.2% | 63.0% | 35.1% | 0.1% | 0.5% | |
| Medical Supply Company with Respiratory Therapist | 73.8% | 1,350 | 0.1% | 59.4% | 39.8% | 0.5% | 0.2% | |
| Medical supply company with orthotic personnel certified by an | | , | | | | | | |
| accrediting organization | 66.5% | 93 | 0.0% | 64.2% | 35.1% | 0.3% | 0.5% | |
| Podiatry | 59.1% | 130 | 1.8% | 64.3% | 31.2% | 0.0% | 2.8% | |
| All Provider Types With Less Than 30 Claims | 52.6% | 201 | 1.6% | 52.3% | 46.1% | 0.0% | 0.0% | |
| Optician | 45.2% | 37 | 0.0% | 56.5% | 43.5% | 0.0% | 0.0% | |
| Individual prosthetic personnel certified by an accrediting organization | 40.5% | 45 | 2.7% | 71.1% | 26.1% | 0.0% | 0.0% | |
| Optometry | 37.7% | 53 | 0.0% | 50.7% | 49.3% | 0.0% | 0.0% | |
| Orthopedic Surgery | 26.9% | 59 | 27.1% | 49.2% | 23.8% | 0.0% | 0.0% | |
| 1 5, | | | | | | | | |
| Ophthalmology | 4.0% | 37 | 0.0% | 0.0% | 100.0% | 0.0% | 0.0% | |
| All Provider Types | 73.8% | 11,996 | 1.0% | 61.4% | 37.1% | 0.1% | 0.4% | |

Table G3: Paid Claims Error Rates by Provider Type and Type of Error: Part A excluding Inpatient Hospital PPS

| | | | | Type of Error | | | | | |
|--|---------------------------------|-------------------------------------|---------------------|-------------------------------|--------------------------------------|---------------------|-------|--|--|
| Provider Types Billed to Part A excluding Inpatient Hospital PPS | Paid Claims Error Rate | Number of Claims in Sample | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other | | |
| Comprehensive Outpatient Rehab Facility | | | | | | | | | |
| (CORF) | 10.2% | 115 | 11.3% | 87.2% | 0.0% | 1.5% | 0.0% | | |
| FQHC | 6.9% | 636 | 2.6% | 94.8% | 2.6% | 0.0% | 0.0% | | |
| OPPS, Laboratory (an FI), Ambulatory (Billing an FI) | 5.5% | 23,357 | 0.3% | 79.9% | 15.2% | 4.4% | 0.2% | | |
| Critical Access Hospital (CAH) Outpatient Services | 5.3% | 2,756 | 0.2% | 81.2% | 14.1% | 4.2% | 0.3% | | |
| Outpatient Rehab Facility (ORF) | 5.2% | 453 | 22.0% | 73.5% | 0.3% | 3.4% | 0.7% | | |
| ННА | 4.8% | 1,723 | 3.1% | 27.5% | 60.1% | 6.5% | 2.7% | | |
| Inpatient Psychiatric Unit | 4.7% | 80 | 0.0% | 82.3% | 0.0% | 0.0% | 17.7% | | |

| | | | Type of Error | | | | | |
|--|---------------------------------|-------------------------------------|---------------------|-------------------------------|--------------------------------------|---------------------|-------|--|
| Provider Types Billed to Part A excluding Inpatient Hospital PPS | Paid Claims Error Rate | Number of Claims in Sample | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other | |
| ESRD | 3.9% | 715 | 0.4% | 85.3% | 9.7% | 4.5% | 0.0% | |
| SNF | 3.6% | 1,677 | 0.1% | 45.7% | 20.2% | 32.8% | 1.2% | |
| Inpatient Rehab Unit | 3.1% | 46 | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% | |
| Hospice | 2.5% | 899 | 4.8% | 27.6% | 64.4% | 0.3% | 2.9% | |
| RHCs | 2.3% | 1,721 | 8.7% | 88.1% | 3.2% | 0.0% | 0.0% | |
| Community Mental Health Center (CMHC) | 0.5% | 96 | 50.9% | 0.0% | 49.1% | 0.0% | 0.0% | |
| Inpatient Psychiatric Hospitals | 0.4% | 37 | 0.0% | 100.0% | 0.0% | 0.0% | 0.0% | |
| All Codes With Less Than 30 Claims | 0.0% | 13 | N/A | N/A | N/A | N/A | N/A | |
| Inpatient Critical Access Hospital | 0.0% | 97 | N/A | N/A | N/A | N/A | N/A | |
| Inpatient Rehabilitation Hospitals | 0.0% | 37 | N/A | N/A | N/A | N/A | N/A | |
| All Provider Types | 4.2% | 34,458 | 1.4% | 59.6% | 27.7% | 9.8% | 1.5% | |

Table G4: Paid Claims Error Rates by Provider Type and Type of Error: Part A Inpatient Hospital PPS

| | Paid Claims Error Rate | Number of Claims in Sample | Type of Error | | | | |
|--|---------------------------------|-------------------------------------|---------------------|-------------------------------|--------------------------------------|---------------------|-------|
| Provider Types Billed to Part A Inpatient Hospital PPS | | | No Documentation | Insufficient Documentation | Medically Unnecessary Services | Incorrect Coding | Other |
| DRG Short Term | 9.8% | 2,429 | 0.2% | 9.3% | 73.0% | 17.4% | 0.1% |
| All Codes With Less Than 30 Claims | 3.6% | 24 | 0.0% | 20.3% | 0.0% | 79.7% | 0.0% |
| All Provider Types | 9.5% | 2,453 | 0.2% | 9.5% | 71.8% | 18.4% | 0.1% |

Appendix H: Coding Problems

E & M Codes

The CMS has historically recognized problems with certain procedure codes. In a letter dated June 1, 2000, the CMS Administrator notified Medicare physicians that CPT codes 99233 and 99214 for evaluation and management (E&M) services had accounted for a significant proportion of the FY 1998 and FY 1999 coding errors. The Administrator noted that documentation for many of these services more appropriately supported CPT codes 99231 and 99212, respectively, and reminded providers to document the specific procedures performed. While other E&M codes also contribute significantly to the error rate, analysis indicates continuing problems with the listed procedure codes.

CPT code 99233, subsequent hospital care. The physician should typically spend 35 minutes with the patient and perform at least two of these key procedures: a detailed interval patient history, a detailed examination, and/or medical decision making of high complexity.

Table H1 summarizes historical error rate data for subsequent hospital care as described by CPT code 99233.

Table H1: Problem Code: CPT Code 99233

| Fiscal Year | Number of Lines Reviewed | Number of Lines Questioned | Percent of Lines in Error |
|-------------|--------------------------------|----------------------------------|---------------------------------|
| 1996 | 217 | 115 | 53.0% |
| 1997 | 416 | 128 | 30.8% |
| 1998 | 457 | 114 | 24.9% |
| 1999 | 187 | 102 | 54.5% |
| 2000 | 449 | 220 | 49.0% |
| 2001 | 338 | 142 | 42.0% |
| 2002 | 228 | 174 | 76.3% |
| 2003 | 709 | 435 | 61.4% |
| 2004 | 768 | 391 | 50.9% |
| 2005 | 1,079 | 474 | 43.9% |
| 2006 | 1,102 | 440 | 39.9% |
| 2007 | 1,157 | 532 | 46.0% |
| 2008 | 1,032 | 489 | 47.40% |
| 2009 | 882 | 433 | 49.10% |
| Nov 2010 | 697 | 366 | 52.5% |

CPT code 99214, office or other outpatient visit. The physician should typically spend 25 minutes face-to-face with the patient and perform at least two of the following procedures: a detailed patient history, a detailed examination, and/or medical decision making of moderate complexity.

Table H2 summarizes historical error rate data for an office or other outpatient visit as described by CPT code 99214.

Table H2: Problem Code: CPT Code 99214

| Fiscal Year | Number of Lines Reviewed Number of Lines Questioned | | Percent of Lines in Error |
|-------------|--|-----|---------------------------------|
| 1996 | 140 | 54 | 38.6% |
| 1997 | 234 | 86 | 36.8% |
| 1998 | 168 | 63 | 37.5% |
| 1999 | 143 | 81 | 56.6% |
| 2000 | 191 | 71 | 37.2% |
| 2001 | 214 | 67 | 31.3% |
| 2002 | 104 | 24 | 23.1% |
| 2003 | 2,798 | 687 | 24.6% |
| 2004 | 3,250 | 589 | 18.1% |
| 2005 | 4,436 | 648 | 14.6% |
| 2006 | 4,491 | 609 | 13.6% |
| 2007 | 4,287 | 602 | 14.0% |
| 2008 | 4,301 | 608 | 14.10% |
| 2009 | 3,342 | 617 | 18.50% |
| Nov 2010 | 2,829 | 569 | 20.1% |

CPT code 99232, subsequent hospital care. For this billing code, the physician should typically spend 25 minutes at bedside with the patient and should perform at least two of the following key procedures: an expanded problem-focused interval patient history, an expanded problem-focused examination, and/or medical decision making of moderate complexity.

Table H3 summarizes historical error rate data for subsequent hospital care as described by CPT code 99232.

Table H3: Problem Code: CPT Code 99232

| | Number of | Number of | Percent of |
|-------------|-----------|------------|------------|
| Fiscal Year | Lines | Lines | Lines in |
| | Reviewed | Questioned | Error |
| 1996 | 597 | 266 | 44.6% |
| 1997 | 1,159 | 350 | 30.2% |
| 1998 | 911 | 181 | 19.9% |
| 1999 | 837 | 279 | 33.3% |
| 2000 | 881 | 270 | 30.6% |
| 2001 | 964 | 146 | 15.1% |
| 2002 | 488 | 179 | 36.7% |
| 2003 | 2,213 | 855 | 38.6% |
| 2004 | 2,485 | 754 | 30.3% |
| 2005 | 3,194 | 555 | 17.4% |
| 2006 | 3,236 | 295 | 9.1% |
| 2007 | 3,164 | 393 | 12.4% |
| 2008 | 2,728 | 316 | 11.60% |
| 2009 | 2,180 | 326 | 15.00% |
| Nov 2010 | 1,693 | 290 | 17.1% |

The American Medical Association (AMA) developed the E&M codes that Medicare physicians use when submitting claims for payment. In 2003, there were 21 categories of E&M codes, including categories such as office or other outpatient service, consultations, emergency department services, and critical care services. Within each category of codes there is a range of three to five levels of HCPCS codes that determines the level of service and the level of payment. There are three key descriptors used to determine the appropriate HCPCS code: history, examination, and medical decision-making. There are four other components, including counseling, coordination of care, nature of presenting problem, and time that are contributory factors, but they are not used to determine the appropriate HCPCS code for billing purposes.

Table H4 lists all E&M codes with 2,000 or more claims in the CERT sample. The table provides information on the types of error found for each code. The table is sorted in descending order by error rate.

Table H4: E&M Codes with more than 2,000 claims reviewed

| | Paid/Allowed Claims Error Rate | | | Provider | | |
|-------------------------|--------------------------------|-----------------------------------|----------------------------------|-------------------------------|--------------------------|-----------------------|
| Part B Provider Type | Paid Error Rate | Projected Improper Payments | Number of Claims in Sample | 95% Confidence Interval | Compliance Error Rate | No Resolution Rate |
| 99214 | 11.8% | \$657,933,414 | 2,824 | 10.5% - 13.1% | 17.2% | 0.0% |
| 99213 | 9.8% | \$478,954,837 | 3,880 | 8.5% - 11.0% | 15.5% | 0.0% |

The OIG and CMS have noted problems with certain procedure codes for the past several years. These problematic codes include CPT codes 99214 (office or other outpatient visit), 99232 (subsequent hospital care level 2) and 99233 (subsequent hospital care level 3).

Table H5 provides information on the impact of 1 level disagreement between Carriers/Part B MAC and providers when coding evaluation and management codes.

Table H5: Impact of One Level E&M (Top 20)

| - |] | Incorrect Coding Errors | | | | |
|--------------------------------------|---------------------------|--------------------------------|---------------------------|--|--|--|
| Final E & M Codes | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | | |
| Office/outpatient visit, est (99214) | 5.2% | \$288,450,608 | 4.5% - 5.9% | | | |
| Subsequent hospital care (99233) | 12.9% | \$213,024,855 | 9.6% - 16.1% | | | |
| Office/outpatient visit, est (99213) | 2.1% | \$103,449,276 | 1.6% - 2.6% | | | |
| Emergency dept visit (99285) | 6.3% | \$73,303,124 | 4.4% - 8.1% | | | |
| Office/outpatient visit, est (99215) | 8.9% | \$69,724,356 | 7.2% - 10.7% | | | |
| Subsequent hospital care (99232) | 2.4% | \$64,277,515 | 1.3% - 3.4% | | | |
| Inpatient consultation (99254) | 9.8% | \$62,902,273 | 7.6% - 12.0% | | | |
| Office consultation (99244) | 5.9% | \$47,233,817 | 4.1% - 7.7% | | | |
| Initial hospital care (99222) | 10.1% | \$37,262,151 | 7.3% - 12.9% | | | |
| Initial hospital care (99223) | 3.1% | \$36,665,769 | 0.9% - 5.3% | | | |
| Nursing fac care, subseq (99309) | 6.9% | \$33,361,309 | 5.3% - 8.5% | | | |
| Office/outpatient visit, est (99212) | 5.0% | \$28,627,781 | 3.4% - 6.5% | | | |
| Office/outpatient visit, new (99203) | 6.9% | \$28,457,568 | 5.1% - 8.8% | | | |

| | Incorrect Coding Errors | | | | |
|--------------------------------------|---------------------------|--------------------------------|---------------------------|--|--|
| Final E & M Codes | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | |
| Subsequent hospital care (99231) | 7.4% | \$26,249,996 | 2.3% - 12.5% | | |
| Office consultation (99243) | 6.7% | \$25,488,028 | 4.8% - 8.6% | | |
| Office/outpatient visit, new (99204) | 5.1% | \$22,113,462 | 3.2% - 7.1% | | |
| Emergency dept visit (99283) | 9.2% | \$17,041,127 | 5.5% - 12.9% | | |
| Inpatient consultation (99253) | 5.5% | \$13,633,457 | 3.5% - 7.5% | | |
| Nursing fac care, subseq (99308) | 3.0% | \$13,259,630 | 1.8% - 4.3% | | |
| Emergency dept visit (99284) | 2.1% | \$11,693,423 | 0.8% - 3.4% | | |
| All Other Codes | 0.1% | \$71,683,732 | 0.1% - 0.2% | | |
| Overall | 1.5% | \$1,287,903,259 | 1.4% - 1.7% | | |

Over-Coding Errors

For most of the coding errors, the medical reviewers determined that providers submitted documentation that supported a lower code than the code submitted (in these cases, providers are said to have over-coded claims).

Tables H6 through H9 lists the top twenty services (if available) with the highest dollars in error due to overcoding for each claim type (Part B, DME, Part A exluding inpatient hospital PPS, and Part A Inpatient Hospital PPS). All estimates presented in tables H6 through H9 are based on a minimum of 30 claims in the sample. Data in these tables are sorted by projected improper payments.

Table H6: Services with Overcoding Errors: Part B

| Service | Overcoding Errors | | | | |
|--|------------------------|--------------------------------|-------------------------|--|--|
| Billed to Part B (HCPCS) | Paid Claims Error Rate | Projected Improper Payments | 95% Confidence Interval | | |
| Office visits - established | 4.4% | \$526,130,526 | 3.9% - 4.9% | | |
| Consultations | 17.7% | \$509,233,545 | 15.6% - 19.8% | | |
| Hospital visit - subsequent | 6.8% | \$365,181,180 | 5.3% - 8.3% | | |
| Hospital visit - initial | 16.8% | \$287,452,560 | 13.9% - 19.8% | | |
| Office visits - new | 15.2% | \$185,701,877 | 12.3% - 18.1% | | |
| Nursing home visit | 8.8% | \$141,014,266 | 6.7% - 10.9% | | |
| Emergency room visit | 5.1% | \$98,907,982 | 3.8% - 6.5% | | |
| Hospital visit - critical care | 3.5% | \$29,397,142 | (0.4%) - 7.4% | | |
| Ambulance | 0.4% | \$21,848,439 | 0.1% - 0.8% | | |
| Lab tests - other (Medicare fee schedule) | 0.9% | \$21,140,041 | (0.3%) - 2.2% | | |
| Dialysis services (Medicare Fee Schedule) | 2.5% | \$20,635,369 | 1.4% - 3.6% | | |
| Minor procedures - other (Medicare fee schedule) | 0.3% | \$12,437,996 | 0.1% - 0.6% | | |
| Home visit | 3.2% | \$9,135,263 | 1.0% - 5.3% | | |
| Lab tests - blood counts | 2.4% | \$7,880,061 | 1.9% - 2.9% | | |
| Other tests - other | 0.6% | \$6,987,720 | (0.1%) - 1.2% | | |
| Advanced imaging - CAT/CT/CTA: other | 0.4% | \$4,825,889 | (0.3%) - 1.1% | | |
| Major procedure - Other | 0.4% | \$4,516,010 | (0.4%) - 1.3% | | |
| Other drugs | 0.1% | \$4,457,089 | (0.0%) - 0.2% | | |

| Service | Overcoding Errors | | | |
|-------------------------------|--|-----------------|-------------------------|--|
| Billed to Part B (HCPCS) | Paid Claims Error Rate Projected Improper Payments | | 95% Confidence Interval | |
| Ambulatory procedures - other | 0.6% | \$3,565,300 | (0.5%) - 1.6% | |
| Specialist - psychiatry | 0.3% | \$2,546,082 | (0.1%) - 0.6% | |
| All Other Codes | 0.1% | \$24,598,192 | 0.0% - 0.1% | |
| Overall | 2.7% | \$2,287,592,527 | 2.5% - 2.9% | |

Table H7: Services with Overcoding Errors: DME

| Service | Overcoding Errors | | | | |
|---------------------------------|------------------------|--------------------------------|------------------------|--|--|
| Billed to DME (HCPCS) | Paid Claims Error Rate | Projected Improper Payments | Paid Claims Error Rate | | |
| Hospital Beds/Accessories | 1.4% | \$2,653,607 | (0.0%) - 2.7% | | |
| Oxygen Supplies/Equipment | 0.2% | \$2,591,415 | (0.0%) - 0.3% | | |
| Support Surfaces | 2.4% | \$1,943,953 | (2.1%) - 6.8% | | |
| Wheelchairs Manual | 0.3% | \$767,058 | (0.1%) - 0.8% | | |
| Upper Limb Orthoses | 0.9% | \$588,478 | (0.4%) - 2.2% | | |
| Surgical Dressings | 0.2% | \$408,433 | (0.2%) - 0.6% | | |
| Tracheostomy Supplies | 1.6% | \$299,647 | 0.9% - 2.4% | | |
| Patient Lift | 1.1% | \$225,498 | (1.0%) - 3.2% | | |
| Glucose Monitor | 0.0% | \$208,193 | (0.0%) - 0.0% | | |
| Nebulizers & Related Drugs | 0.0% | \$146,127 | (0.0%) - 0.1% | | |
| Urological Supplies | 0.0% | \$71,842 | (0.0%) - 0.1% | | |
| Suction Pump | 0.4% | \$58,306 | (0.4%) - 1.2% | | |
| Wheelchairs Options/Accessories | 0.0% | \$48,277 | (0.0%) - 0.0% | | |
| Immunosuppressive Drugs | 0.0% | \$3,337 | (0.0%) - 0.0% | | |
| Overall | 0.1% | \$10,014,171 | 0.0% - 0.2% | | |

Table H8: Services with Overcoding Errors: Part A excluding Inpatient Hospital PPS

| Service | Overcoding Errors | | | | |
|---|------------------------|--------------------------------|-------------------------|--|--|
| Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Paid Claims Error Rate | Projected Improper Payments | 95% Confidence Interval | | |
| SNF Inpatient | 1.2% | \$277,701,483 | 0.6% - 1.8% | | |
| Hospital Outpatient | 0.1% | \$40,490,637 | 0.1% - 0.2% | | |
| Home Health | 0.2% | \$33,742,477 | 0.1% - 0.3% | | |
| Clinic ESRD | 0.2% | \$13,359,867 | (0.0%) - 0.4% | | |
| Critical Access Hospital | 0.1% | \$4,875,801 | 0.1% - 0.2% | | |
| SNF Inpatient Part B | 0.2% | \$3,858,694 | (0.0%) - 0.5% | | |
| Hospital Other Part B | 0.4% | \$1,776,778 | 0.3% - 0.6% | | |
| Clinic OPT | 0.2% | \$956,359 | (0.0%) - 0.3% | | |
| Hospital based hospice | 0.1% | \$724,545 | (0.0%) - 0.1% | | |
| Clinic CORF | 0.1% | \$300,218 | 0.0% - 0.3% | | |
| SNF Outpatient | 0.1% | \$245,109 | (0.0%) - 0.3% | | |
| Hospital Inpatient Part B | 0.1% | \$202,729 | 0.0% - 0.1% | | |
| Nonhospital based hospice | 0.0% | \$146,951 | (0.0%) - 0.0% | | |
| Overall | 0.3% | \$378,381,647 | 0.2% - 0.5% | | |

Table H9: Services with Overcoding Errors: Part A Inpatient Hospital PPS

| Service | Overcoding Errors | | | | |
|--|--|-----------------|-------------------------|--|--|
| Billed to Part A Inpatient Hospital PPS (Type of Bill) | Paid Claims Error Rate Projected Improper Payments | | 95% Confidence Interval | | |
| Permanent Cardiac Pacemaker Implant (242, 243, 244) | 8.6% | \$179,733,755 | 7.3% - 9.9% | | |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours (871, 872) | 3.2% | \$156,737,772 | 0.7% - 5.8% | | |
| Major Small & Large Bowel Procedures (329, 330, 331) | 3.6% | \$81,512,478 | (3.0%) - 10.2% | | |
| Respiratory Infections & Inflammations (177, 178, 179) | 2.6% | \$55,366,628 | 2.3% - 2.9% | | |
| Acute Myocardial Infarction, Discharged Alive (280, 281, 282) | 4.0% | \$43,964,048 | (1.7%) - 9.7% | | |
| Simple Pneumonia & Pleurisy (193, 194, 195) | 1.5% | \$38,597,803 | 0.8% - 2.1% | | |
| Kidney & Urinary Tract Infections (689, 690) | 2.8% | \$34,958,482 | 2.1% - 3.6% | | |
| G.I. Hemorrhage (377, 378, 379) | 1.8% | \$26,828,090 | 1.2% - 2.3% | | |
| Heart Failure & Shock (291, 292, 293) | 0.4% | \$16,974,447 | (0.1%) - 0.8% | | |
| Renal Failure (682, 683, 684) | 0.4% | \$8,432,950 | (0.4%) - 1.3% | | |
| Hip & Femur Procedures Except Major Joint (480, 481, 482) | 0.4% | \$7,780,135 | 0.1% - 0.7% | | |
| Intracranial Hemorrhage Or Cerebral Infarction (064, 065, 066) | 0.4% | \$7,029,328 | (0.1%) - 0.9% | | |
| Cardiac Arrhythmia & Conduction Disorders (308, 309, 310) | 0.3% | \$4,810,938 | (0.2%) - 0.8% | | |
| Nutritional & Misc Metabolic Disorders (640, 641) | 0.3% | \$3,768,830 | (0.2%) - 0.8% | | |
| Syncope & Collapse (312) | 0.5% | \$3,478,031 | 0.4% - 0.7% | | |
| Chest Pain (313) | 0.1% | \$740,128 | (0.1%) - 0.3% | | |
| All Other Codes | 0.9% | \$691,160,531 | 0.5% - 1.3% | | |
| Overall | 1.1% | \$1,361,874,375 | 0.7% - 1.6% | | |

Appendix I – Overpayments

Tables I1 through I4 provide the service-specific overpayment rates for each claim type (Part B/DME/Part A excluding Inpatient Hospital PPS and Part A Inpatient Hospital PPS). Each table contains information for the top 20 improperly paid services. FY 2004 was the first year that CMS included service specific overpayment rates. The tables are sorted in descending order by projected improper payments.

Table I1: Service Specific Overpayment Rates: Part B

| | _ | | | | | |
|---|----------------------------------|---------------------------------|----------------------------------|------------------------------------|-------------------------------|----------------------|
| Service Billed to Part B (HCPCS) | Number of Claims in Sample | Number of Lines in Sample | Dollars Overpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Overpaid | Overpayme nt Rate |
| All Codes With Less | | | | | | |
| Than 30 Claims | 6,815 | 10,509 | \$119,050 | \$1,219,556 | \$2,792,603,577 | 9.9% |
| Office/outpatient visit, est (99214) | 2,824 | 2,829 | \$25,721 | \$235,649 | \$651,775,405 | 11.7% |
| Subsequent hospital care (99233) | 459 | 692 | \$18,454 | \$64,619 | \$562,554,020 | 34.0% |
| Office/outpatient visit, est (99213) | 3,880 | 3,931 | \$18,082 | \$215,884 | \$429,141,455 | 8.7% |
| Subsequent hospital care (99232) | 997 | 1,686 | \$15,287 | \$114,382 | \$348,551,943 | 12.9% |
| Initial hospital care (99223) | 268 | 268 | \$13,565 | \$45,975 | \$345,973,733 | 29.2% |
| Therapeutic exercises (97110) | 768 | 921 | \$9,849 | \$43,499 | \$251,416,322 | 24.0% |
| Office consultation (99244) | 215 | 215 | \$7,124 | \$35,446 | \$184,461,383 | 23.0% |
| Office/outpatient visit, est (99215) | 304 | 306 | \$7,683 | \$33,763 | \$178,324,303 | 22.9% |
| Tte w/doppler, complete (93306) | 272 | 274 | \$6,573 | \$38,287 | \$174,271,831 | 18.2% |
| Inpatient consultation (99254) | 183 | 183 | \$7,294 | \$26,344 | \$165,679,326 | 25.8% |
| Chiropractic manipulation (98941) | 472 | 625 | \$7,454 | \$17,702 | \$160,486,984 | 42.0% |
| Critical care, first hour (99291) | 133 | 156 | \$4,117 | \$32,144 | \$146,132,429 | 18.4% |
| Radiation tx delivery, imrt (77418) | 34 | 59 | \$2,728 | \$24,107 | \$124,174,434 | 18.3% |
| Emergency dept visit (99285) | 325 | 325 | \$5,256 | \$51,253 | \$113,998,212 | 9.8% |
| Nursing fac care, subseq (99309) | 224 | 247 | \$3,631 | \$17,639 | \$112,763,569 | 23.2% |
| Psytx, off, 45-50 min (90806) | 168 | 250 | \$3,721 | \$11,502 | \$111,225,829 | 37.6% |
| bls (A0428) | 258 | 285 | \$5,905 | \$53,708 | \$107,709,170 | 8.7% |
| Inpatient consultation (99255) | 96 | 96 | \$4,588 | \$16,973 | \$106,664,510 | 27.8% |
| Office/outpatient visit, new (99204) | 157 | 157 | \$4,594 | \$19,168 | \$98,986,723 | 23.0% |
| All Other Codes | 20,453 | 36,030 | \$156,480 | \$1,315,402 | \$3,549,810,169 | 11.8% |
| Combined | 30,965 | 60,044 | \$447,155 | \$3,633,003 | \$10,716,705,326 | 12.7% |

Table I2: Service Specific Overpayment Rates: DME

| Service | Number of | Number of | Dollars | Total Dollars | | |
|--|-----------|-----------|-------------|---------------|-------------------|-----------|
| Billed to DME | Claims in | Lines in | Overpaid in | Paid in | Projected Dollars | Overpayme |
| (HCPCS) | Sample | Sample | Sample | Sample | Overpaid | nt Rate |
| All Codes With Less | 2.100 | 2.220 | Φ426 101 | ф.000.000 | Φ2 210 cc0 7c7 | 67.107 |
| Than 30 Claims Oxygen concentrator | 2,180 | 3,320 | \$436,191 | \$688,990 | \$2,219,669,767 | 67.1% |
| (E1390) | 1,828 | 1,892 | \$216,450 | \$284,923 | \$1,017,814,585 | 75.2% |
| Blood glucose/reagent strips (A4253) | 2,240 | 2,258 | \$200,681 | \$234,367 | \$943,403,096 | 86.1% |
| PWC gp 2 std cap chair (K0823) | 40 | 40 | \$124,081 | \$127,722 | \$597,665,902 | 96.6% |
| Hosp bed semi-electr w/ matt (E0260) | 368 | 382 | \$30,861 | \$35,864 | \$145,018,777 | 87.1% |
| Tacrolimus oral per 1 MG (J7507) | 68 | 69 | \$22,880 | \$40,216 | \$116,577,207 | 63.1% |
| Budesonide non-comp unit (J7626) | 136 | 141 | \$21,225 | \$45,034 | \$107,926,519 | 49.6% |
| Lancets per box (A4259) | 1,293 | 1,300 | \$20,690 | \$23,910 | \$100,675,794 | 86.5% |
| Cont airway pressure | | | | · | | |
| device (E0601) Mycophenolate mofetil | 465 | 498 | \$20,943 | \$34,508 | \$100,430,351 | 61.5% |
| oral (J7517) | 62 | 63 | \$22,237 | \$35,959 | \$98,131,932 | 67.9% |
| Portable gaseous 02 (E0431) | 959 | 991 | \$18,316 | \$24,090 | \$84,615,502 | 74.6% |
| Diab shoe for density insert (A5500) | 183 | 199 | \$17,163 | \$22,215 | \$82,243,307 | 76.4% |
| High strength ltwt whlchr (K0004) | 141 | 155 | \$14,089 | \$14,573 | \$73,099,061 | 97.7% |
| Enteral feed supp pump per d (B4035) | 120 | 121 | \$18,296 | \$28,268 | \$71,454,022 | 62.7% |
| EF spec metabolic noninherit (B4154) | 43 | 43 | \$13,603 | \$17,026 | \$68,530,204 | 83.0% |
| Arformoterol non-comp unit (J7605) | 46 | 46 | \$11,273 | \$15,465 | \$64,068,407 | 76.8% |
| Multi den insert direct form (A5512) | 111 | 125 | \$12,208 | \$15,586 | \$63,189,956 | 77.8% |
| Disp fee inhal drugs/30 days (Q0513) | 578 | 584 | \$12,071 | \$18,110 | \$56,133,134 | 67.2% |
| Nasal application device (A7034) | 177 | 177 | \$11,957 | \$16,748 | \$56,120,444 | 70.0% |
| RAD w/o backup non- inv intfc (E0470) | 96 | 98 | \$10,917 | \$16,394 | \$54,648,342 | 69.2% |
| All Other Codes | 5,656 | 7,913 | \$236,102 | \$329,760 | \$1,129,876,487 | 72.6% |
| Combined | 11,996 | 20,415 | \$1,492,233 | \$2,069,727 | \$7,251,292,798 | 73.8% |

Table I3: Service Specific Overpayment Rates: Part A excluding Inpatient Hospital PPS

| Service Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Number of Claims in Sample | Dollars Overpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Overpaid | Overpayme nt Rate |
|--|----------------------------------|----------------------------------|------------------------------------|----------------------------------|----------------------|
| Hospital Outpatient | 19,931 | \$391,548 | \$7,692,481 | \$1,486,269,897 | 5.2% |
| Home Health | 1,656 | \$182,766 | \$4,330,569 | \$961,058,972 | 4.6% |
| SNF Inpatient | 1,055 | \$178,100 | \$5,140,095 | \$754,307,160 | 3.2% |
| Clinic ESRD | 715 | \$65,639 | \$1,817,602 | \$298,073,608 | 3.9% |
| Nonhospital based hospice | 788 | \$49,231 | \$2,409,173 | \$269,121,243 | 2.4% |
| Critical Access Hospital | 2,756 | \$69,841 | \$1,228,162 | \$206,860,603 | 5.1% |
| Hospital Inpatient (Part A) | 306 | \$45,911 | \$2,514,919 | \$183,380,391 | 2.1% |
| SNF Inpatient Part B | 521 | \$29,846 | \$370,733 | \$122,993,920 | 7.4% |
| Hospital Other Part B | 3,260 | \$29,399 | \$119,183 | \$117,592,901 | 27.2% |
| Hospital based hospice | 111 | \$12,362 | \$320,861 | \$54,215,716 | 3.8% |
| Hospital Inpatient Part B | 115 | \$5,994 | \$73,857 | \$44,512,459 | 11.2% |
| Clinic – Freestanding (Effective April 1, 2010) | 636 | \$3,888 | \$59,530 | \$32,477,464 | 6.9% |
| Clinic OPT | 453 | \$8,963 | \$143,689 | \$32,257,014 | 5.2% |
| SNF Outpatient | 101 | \$3,609 | \$45,467 | \$24,628,531 | 13.3% |
| Clinic CORF | 115 | \$3,889 | \$52,747 | \$20,528,731 | 10.2% |
| Hospital Swing Bed | 51 | \$3,508 | \$386,997 | \$13,928,431 | 1.2% |
| Clinical Rural Health | 1,721 | \$4,184 | \$167,255 | \$13,853,420 | 2.3% |
| Community Mental Health Centers | 96 | \$605 | \$85,041 | \$1,598,668 | 0.5% |
| All Other Codes | 71 | \$0 | \$15,560 | \$0 | 0.0% |
| Combined | 34,458 | \$1,089,284 | \$26,973,921 | \$4,637,659,129 | 4.1% |

Table I4: Service Specific Overpayment Rates: Part A Inpatient Hospital PPS

| Service Billed to Part A Inpatient Hospital PPS (MS-DRG) | Number of Claims in Sample | Dollars Overpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Overpaid | Overpayme nt Rate |
|--|----------------------------------|----------------------------------|------------------------------------|----------------------------------|----------------------|
| All Codes With Less | 1.020 | \$4.505.505 | **** | 40.400.000.455 | 0.204 |
| Than 30 Claims | 1,829 | \$1,537,707 | \$20,818,825 | \$8,188,023,157 | 8.3% |
| Major Joint Replacement | | | | | |
| Or Reattachment Of | | | | | |
| Lower Extremity W/O | 0.4 | #210.010 | #4.000.022 | ** *** *** *** | 25.40 |
| Mcc (470) | 94 | \$219,048 | \$1,080,032 | \$1,371,044,502 | 26.1% |
| Perc Cardiovasc Proc W | | | | | |
| Drug-Eluting Stent W/O | | | **** | **** | |
| Mcc (247) | 30 | \$78,009 | \$288,243 | \$241,666,314 | 21.2% |
| Septicemia Or Severe | | | | | |
| Sepsis W/O Mv 96+ | | | | | |
| Hours W Mcc (871) | 65 | \$45,671 | \$798,461 | \$229,006,153 | 5.0% |
| Chest Pain (313) | 49 | \$46,670 | \$156,619 | \$168,421,077 | 20.9% |
| Esophagitis, Gastroent & | | | | | |
| Misc Digest Disorders | | | | | |
| W/O Mcc (392) | 38 | \$25,244 | \$145,597 | \$121,594,263 | 15.4% |
| Nutritional & Misc | | | | | |
| Metabolic Disorders W/O | | | | | |
| Mcc (641) | 36 | \$17,877 | \$151,650 | \$74,795,071 | 14.7% |

| Service Billed to Part A Inpatient Hospital PPS (MS-DRG) | Number of Claims in Sample | Dollars Overpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Overpaid | Overpayme nt Rate |
|--|----------------------------------|----------------------------------|------------------------------------|----------------------------------|----------------------|
| Syncope & Collapse (312) | 38 | \$18,325 | \$147,549 | \$74,323,384 | 11.2% |
| Kidney & Urinary Tract Infections W/O Mcc (690) | 36 | \$13,348 | \$152,359 | \$70,736,043 | 10.9% |
| Simple Pneumonia & Pleurisy W Cc (194) | 31 | \$5,124 | \$186,405 | \$30,689,234 | 4.3% |
| Heart Failure & Shock W Mcc (291) | 54 | \$12,182 | \$492,724 | \$14,380,653 | 0.6% |
| Heart Failure & Shock W Cc (292) | 45 | \$7,445 | \$255,688 | \$9,370,294 | 0.6% |
| Chronic Obstructive Pulmonary Disease W/O Cc/Mcc (192) | 30 | \$2,438 | \$118,971 | \$8,601,782 | 1.4% |
| All Other Codes | 78 | \$0 | \$312,700 | \$0 | 0.0% |
| Combined | 2,453 | \$2,029,087 | \$25,105,823 | \$10,602,651,926 | 8.9% |

Table I5: Service Specific Overpayment Rates: All CERT

| Service Billed to Part B/DME/Part A including Inpatient Hospital | Number of Claims in Sample | Dollars Overpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Overpaid | Overpayme nt Rate |
|--|----------------------------------|----------------------------------|------------------------------------|----------------------------------|----------------------|
| All | 79,872 | \$5,057,759 | \$57,782,473 | \$33,208,309,179 | 10.2% |

Appendix J - Underpayments

Appendix J provides data on Medicare FFS underpayments. Underpayments often occur when the medical reviewers determine that documentation supports a higher code than the code the provider submited. In these cases, the providers are said to have "under-coded" claims, resulting in an "underpayment". In other words, the Medicare claims processing contractors should have paid a higher fee schedule amount.

Tables J1 through J4 provide the service-specific underpayment rates for each claim type (Part B, DME, Part A excluding Inpatient Hospital PPS, Part A Inpatient Hospital PPS). Data in these tables is sorted in descending order by the projected underpaid dollar amount. All estimates in tables J1 through J4 are based on a minimum of 30 claims in the sample with at least one claim underpaid.

Table J1: Service Specific Underpayment Rates: Part B

| Service Billed to Part B (HCPCS) | Number of Claims in Sample | Number of Lines in Sample | Dollars Underpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Underpaid | Underpymt Rate |
|---------------------------------------|----------------------------------|---------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|-------------------|
| Office/outpatient visit, est (99213) | 3,880 | 3,931 | \$2,404 | \$215,884 | \$49,813,382 | 1.0% |
| Office/outpatient visit, est (99212) | 789 | 791 | \$1,994 | \$25,495 | \$41,264,754 | 7.2% |
| All Codes With Less Than 30 Claims | 6,815 | 10,509 | \$1,294 | \$1,219,556 | \$34,259,845 | 0.1% |
| Subsequent hospital care (99231) | 295 | 463 | \$821 | \$16,577 | \$26,249,435 | 7.4% |
| Emergency dept visit (99283) | 164 | 164 | \$816 | \$8,864 | \$16,069,982 | 8.7% |
| Office/outpatient visit, est (99211) | 328 | 330 | \$391 | \$5,211 | \$8,770,615 | 7.0% |
| Office/outpatient visit, est (99214) | 2,824 | 2,829 | \$215 | \$235,649 | \$6,158,010 | 0.1% |
| Nursing fac care, subseq (99307) | 121 | 131 | \$190 | \$4,511 | \$5,690,439 | 5.5% |
| Initial hospital care (99222) | 138 | 139 | \$204 | \$15,605 | \$5,660,148 | 1.5% |
| Nursing fac care, subseq (99308) | 285 | 311 | \$65 | \$16,759 | \$3,825,864 | 0.9% |
| Inpatient consultation (99254) | 183 | 183 | \$84 | \$26,344 | \$3,140,290 | 0.5% |
| Inpatient consultation (99253) | 98 | 98 | \$102 | \$10,067 | \$2,970,840 | 1.2% |
| Office consultation (99243) | 158 | 158 | \$115 | \$17,120 | \$2,617,364 | 0.7% |
| Subsequent hospital care (99232) | 997 | 1,686 | \$127 | \$114,382 | \$2,209,521 | 0.1% |
| Inpatient consultation (99252) | 42 | 42 | \$73 | \$2,645 | \$2,204,976 | 4.6% |
| Therapeutic exercises (97110) | 768 | 921 | \$95 | \$43,499 | \$1,870,818 | 0.2% |
| Destruct premalg les, 2-14 (17003) | 147 | 153 | \$79 | \$4,678 | \$1,719,957 | 1.9% |
| Home visit, est patient (99349) | 36 | 37 | \$41 | \$3,854 | \$869,689 | 0.9% |
| Chemo, iv infusion, addl hr (96415) | 32 | 32 | \$44 | \$1,287 | \$807,926 | 2.8% |
| Ground mileage (A0425) | 570 | 597 | \$35 | \$41,066 | \$676,246 | 0.1% |
| All Other Codes | 21,059 | 36,539 | \$451 | \$1,603,949 | \$5,764,133 | 0.0% |
| Combined | 30,965 | 60,044 | \$9,641 | \$3,633,003 | \$222,614,233 | 0.3% |

Table J2: Service Specific Underpayment Rates: DME

| Service Billed to DMEs (HCPCS) | Number of Claims in Sample | Number of Lines in Sample | Dollars Underpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Underpaid | Underpymt Rate |
|--------------------------------------|----------------------------------|---------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|-------------------|
| Budesonide non-comp unit (J7626) | 136 | 141 | \$34 | \$45,034 | \$99,949 | 0.0% |
| Albuterol ipratrop non-comp (J7620) | 294 | 297 | \$0 | \$9,155 | \$0 | 0.0% |
| CPAP full face mask (A7030) | 79 | 79 | \$0 | \$12,328 | \$0 | 0.0% |
| Calibrator solution/chips (A4256) | 688 | 690 | \$0 | \$6,708 | \$0 | 0.0% |
| Diab shoe for density insert (A5500) | 183 | 199 | \$0 | \$22,215 | \$0 | 0.0% |
| Disp fee inhal drugs/30 days (Q0513) | 578 | 584 | \$0 | \$18,110 | \$0 | 0.0% |
| Drain ostomy pouch w/flange (A5063) | 42 | 43 | \$0 | \$2,822 | \$0 | 0.0% |
| Nebulizer with compression (E0570) | 654 | 688 | \$0 | \$8,392 | \$0 | 0.0% |
| Oxygen concentrator (E1390) | 1,828 | 1,892 | \$0 | \$284,923 | \$0 | 0.0% |
| Portable 02 contents, gas (E0443) | 168 | 174 | \$0 | \$11,500 | \$0 | 0.0% |
| Portable gas oxygen system (K0738) | 149 | 154 | \$0 | \$6,815 | \$0 | 0.0% |
| Replacement nasal cushion (A7032) | 55 | 59 | \$0 | \$3,098 | \$0 | 0.0% |
| Trapeze bar attached to bed (E0910) | 53 | 55 | \$0 | \$687 | \$0 | 0.0% |
| All Other Codes | 9,683 | 15,360 | \$0 | \$1,637,939 | \$0 | 0.0% |
| Combined | 11,996 | 20,415 | \$34 | \$2,069,727 | \$99,949 | 0.0% |

Table J3: Service Specific Underpayment Rates: Part A excluding Inpatient Hospital PPS

| Service Billed to Part A excluding Inpatient Hospital PPS (Type of Bill) | Number of Claims in Sample | Number of Lines in Sample | Dollars Underpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Underpaid | Underpymt Rate |
|--|----------------------------------|---------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|-------------------|
| Hospital Outpatient | 19,931 | 19,931 | \$10,484 | \$7,692,481 | \$43,878,150 | 0.2% |
| Home Health | 1,656 | 1,656 | \$5,962 | \$4,330,569 | \$34,458,989 | 0.2% |
| SNF Inpatient | 1,055 | 1,055 | \$6,274 | \$5,140,095 | \$18,359,096 | 0.1% |
| Critical Access Hospital | 2,756 | 2,756 | \$2,920 | \$1,228,162 | \$7,787,416 | 0.2% |
| SNF Inpatient Part B | 521 | 521 | \$320 | \$370,733 | \$2,714,506 | 0.2% |
| Hospital Other Part B | 3,260 | 3,260 | \$107 | \$119,183 | \$378,350 | 0.1% |
| Clinic ESRD | 715 | 715 | \$114 | \$1,817,602 | \$236,959 | 0.0% |
| Clinic OPT | 453 | 453 | \$33 | \$143,689 | \$150,911 | 0.0% |
| Hospital Inpatient Part B | 115 | 115 | \$1 | \$73,857 | \$3,479 | 0.0% |
| All Other Codes | 3,996 | 3,996 | \$0 | \$6,057,550 | \$0 | 0.0% |
| Combined | 34,458 | 34,458 | \$26,216 | \$26,973,921 | \$107,967,855 | 0.1% |

Table J4: Service Specific Underpayment Rates: Part A Inpatient Hospital PPS

| Service Billed to Part A Inpatient Hospital PPS (MS-DRG) | Number of Claims in Sample | Number of Lines in Sample | Dollars Underpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Underpaid | Underpymt Rate |
|---|----------------------------------|---------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|-------------------|
| All Codes With Less Than 30 | 1 020 | 1.020 | Ф157 220 | #20 010 025 | ФСС1 27.1 70.6 | 0.70/ |
| Claims | 1,829 | 1,829 | \$157,329 | \$20,818,825 | \$661,274,706 | 0.7% |
| Heart Failure & Shock W Cc (292) | 45 | 45 | \$6,616 | \$255,688 | \$34,949,929 | 2.4% |
| Kidney & Urinary Tract Infections W/O Mcc (690) | 36 | 36 | \$3,722 | \$152,359 | \$12,930,822 | 2.0% |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours W Mcc (871) | 65 | 65 | \$4,162 | \$798,461 | \$10,980,002 | 0.2% |
| Heart Failure & Shock W Mcc (291) | 54 | 54 | \$2,901 | \$492,724 | \$8,644,786 | 0.3% |
| Nutritional & Misc Metabolic Disorders W/O Mcc (641) | 36 | 36 | \$226 | \$151,650 | \$800,101 | 0.2% |
| Esophagitis, Gastroent & Misc Digest Disorders W/O Mcc (392) | 38 | 38 | \$57 | \$145,597 | \$93,318 | 0.0% |
| All Other Codes | 350 | 350 | \$0 | \$2,290,519 | \$0 | 0.0% |
| Combined | 2,453 | 2,453 | \$175,013 | \$25,105,823 | \$729,673,664 | 0.6% |

Table J5: Service Specific Underpayment Rates: All Contractors

| Service Billed to Part B/DME/Part A including Inpatient Hospital PPS | Number of Claims in Sample | Number of Lines in Sample | Dollars Underpaid in Sample | Total Dollars Paid in Sample | Projected Dollars Underpaid | Underpymt Rate |
|--|----------------------------------|---------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|-------------------|
| | 5 0.0 50 | 445.050 | 0210.002 | \$55.50 2.452 | \$1,060,355,70 | 0.004 |
| All | 79,872 | 117,370 | \$210,903 | \$57,782,473 | 1 | 0.3% |

Appendix K – Statistics and Other Information for the CERT Sample

The tables in this section of the appendix provide statistics and other information that can be calculated from the CERT sample data.

Tables K1 through K4 provides information on the sample size for each category for which this report makes national estimates. These tables also show the number of claims containing errors and the percent of claims with payment errors. Data in these tables for Part B and DME data is expressed in terms of line items, and data in these tables for Part A data is expressed in terms of claims. Totals cannot be calculated for these categories since CMS is using different units for each type of service.

Table K1: Claims in Error: Part B

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|--|---------------------------------|---------------------------------------|--|
| Hcpcs Procedure Code | | | |
| All Codes With Less Than 30 Claims | 10,509 | 1,486 | 14.1% |
| Complete cbc w/auto diff wbc (85025) | 1,165 | 401 | 34.4% |
| Comprehen metabolic panel (80053) | 961 | 168 | 17.5% |
| Office/outpatient visit, est (99213) | 3,931 | 483 | 12.3% |
| Office/outpatient visit, est (99214) | 2,829 | 569 | 20.1% |
| Prescrip not gen at encounte (G8445) | 811 | 0 | 0.0% |
| Prothrombin time (85610) | 841 | 225 | 26.8% |
| Routine venipuncture (36415) | 2,449 | 467 | 19.1% |
| Subsequent hospital care (99232) | 1,686 | 286 | 17.0% |
| Therapeutic exercises (97110) | 921 | 208 | 22.6% |
| Other | 33,941 | 6,299 | 18.6% |
| TOS Code | | | |
| Hospital visit - subsequent | 3,204 | 818 | 25.5% |
| Lab tests - automated general profiles | 1,463 | 260 | 17.8% |
| Lab tests - blood counts | 1,413 | 457 | 32.3% |
| Lab tests - other (non-Medicare fee schedule) | 7,363 | 1,418 | 19.3% |
| Lab tests - routine venipuncture (non Medicare fee schedule) | 2,506 | 467 | 18.6% |
| Minor procedures - other (Medicare fee schedule) | 3,706 | 778 | 21.0% |
| Office visits - established | 8,484 | 1,509 | 17.8% |
| Specialist - opthamology | 1,666 | 114 | 6.8% |
| Specialist - other | 2,378 | 36 | 1.5% |
| Standard imaging - chest | 1,529 | 263 | 17.2% |
| Other | 26,332 | 4,472 | 17.0% |
| Resolution Type | | | |

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|--|---------------------------------|---------------------------------------|--|
| Automated | 13,340 | 744 | 5.6% |
| Complex | 27 | 5 | 18.5% |
| None | 46,626 | 9,840 | 21.1% |
| Routine | 51 | 3 | 5.9% |
| Diagnosis Code | | | |
| Arthropathies and related disorders | 3,111 | 665 | 21.4% |
| Diseases of other endocrine glands | 2,983 | 490 | 16.4% |
| Diseases of the blood and bloodforming organs | 1,766 | 434 | 24.6% |
| Disorders of the eye and adnexa | 3,103 | 226 | 7.3% |
| Dorsopathies | 2,648 | 519 | 19.6% |
| Hypertensive disease | 2,863 | 494 | 17.3% |
| Other forms of heart disease | 2,669 | 591 | 22.1% |
| Other metabolic disorders and immunity disorders | 2,330 | 427 | 18.3% |
| Persons encountering health services for specific procedures and aftercare | 1,724 | 386 | 22.4% |
| Symptoms | 6,316 | 1,041 | 16.5% |
| Other | 30,531 | 5,319 | 17.4% |

Table K2: Claims in Error: DME

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|--|---------------------------------|---------------------------------------|--|
| Hcpcs Procedure Code | | | |
| All Codes With Less Than 30 Claims | 3,320 | 1,641 | 49.4% |
| Blood glucose/reagent strips (A4253) | 2,258 | 1,883 | 83.4% |
| Calibrator solution/chips (A4256) | 690 | 576 | 83.5% |
| Cont airway pressure device (E0601) | 498 | 270 | 54.2% |
| Disp fee inhal drugs/30 days (Q0513) | 584 | 377 | 64.6% |
| Hosp bed semi-electr w/ matt (E0260) | 382 | 292 | 76.4% |
| Lancets per box (A4259) | 1,300 | 1,074 | 82.6% |
| Nebulizer with compression (E0570) | 688 | 361 | 52.5% |
| Oxygen concentrator (E1390) | 1,892 | 1,280 | 67.7% |
| Portable gaseous 02 (E0431) | 991 | 658 | 66.4% |
| Other | 7,812 | 5,051 | 64.7% |
| TOS Code | | | |
| All Policy Groups with Less than 30 Claims | 541 | 228 | 42.1% |
| CPAP | 1,932 | 1,201 | 62.2% |
| Enteral Nutrition | 531 | 316 | 59.5% |
| Glucose Monitor | 4,836 | 3,974 | 82.2% |
| Hospital Beds/Accessories | 505 | 377 | 74.7% |
| Immunosuppressive Drugs | 467 | 274 | 58.7% |
| Nebulizers & Related Drugs | 2,777 | 1,691 | 60.9% |
| Oxygen Supplies/Equipment | 3,484 | 2,320 | 66.6% |
| Wheelchairs Manual | 779 | 621 | 79.7% |
| Wheelchairs Options/Accessories | 613 | 462 | 75.4% |
| Other | 3,950 | 1,999 | 50.6% |
| Resolution Type | | | |

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|---|---------------------------------|---------------------------------------|--|
| Automated | 2,870 | 47 | 1.6% |
| Complex | 20 | 5 | 25.0% |
| None | 17,407 | 13,323 | 76.5% |
| Routine | 118 | 88 | 74.6% |
| Diagnosis Code | | | |
| All Codes With Less Than 30 Claims | 814 | 417 | 51.2% |
| Arthropathies and related disorders | 610 | 417 | 68.4% |
| Cerebrovascular disease | 384 | 248 | 64.6% |
| Chronic obstructive pulmonary disease and allied conditions | 5,086 | 3,268 | 64.3% |
| Diseases of other endocrine glands | 5,438 | 4,391 | 80.7% |
| Ill-defined and unknown causes of morbidity and mortality | 427 | 282 | 66.0% |
| No Matching Diagnosis Code Label | 1,871 | 1,150 | 61.5% |
| Other forms of heart disease | 530 | 382 | 72.1% |
| Persons with a condition influencing their health status | 1,356 | 640 | 47.2% |
| Symptoms | 1,095 | 627 | 57.3% |
| Other | 2,804 | 1,641 | 58.5% |

Table K3: Claims in Error: Part A excluding Inpatient Hospital PPS

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|---|---------------------------------|---------------------------------------|--|
| Type Of Bill | | | |
| Clinic ESRD | 715 | 119 | 16.6% |
| Clinic – Freestanding (Effective April 1, 2010) | 636 | 36 | 5.7% |
| Clinical Rural Health | 1,721 | 52 | 3.0% |
| Critical Access Hospital | 2,756 | 671 | 24.3% |
| Home Health | 1,656 | 154 | 9.3% |
| Hospital Other Part B | 3,260 | 1,063 | 32.6% |
| Hospital Outpatient | 19,931 | 4,019 | 20.2% |
| Nonhospital based hospice | 788 | 23 | 2.9% |
| SNF Inpatient | 1,055 | 118 | 11.2% |
| SNF Inpatient Part B | 521 | 83 | 15.9% |
| Other | 1,419 | 132 | 9.3% |
| TOS Code | | | |
| Clinic ESRD | 715 | 119 | 16.6% |
| Clinic – Freestanding (Effective April 1, 2010) | 636 | 36 | 5.7% |
| Clinical Rural Health | 1,721 | 52 | 3.0% |
| Critical Access Hospital | 2,756 | 671 | 24.3% |
| Home Health | 1,656 | 154 | 9.3% |
| Hospital Other Part B | 3,260 | 1,063 | 32.6% |
| Hospital Outpatient | 19,931 | 4,019 | 20.2% |
| Nonhospital based hospice | 788 | 23 | 2.9% |
| SNF Inpatient | 1,055 | 118 | 11.2% |
| SNF Inpatient Part B | 521 | 83 | 15.9% |
| Other | 1,419 | 132 | 9.3% |

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|--|---------------------------------|---------------------------------------|--|
| Diagnosis Code | | | |
| Arthropathies and related disorders | 1,344 | 207 | 15.4% |
| Diseases of other endocrine glands | 1,618 | 324 | 20.0% |
| Dorsopathies | 1,013 | 111 | 11.0% |
| Hypertensive disease | 1,662 | 347 | 20.9% |
| Nephritis, nephrotic syndrome, and nephrosis | 1,054 | 225 | 21.3% |
| Other forms of heart disease | 1,749 | 404 | 23.1% |
| Other metabolic disorders and immunity disorders | 1,229 | 358 | 29.1% |
| Persons encountering health services for specific procedures and aftercare | 3,001 | 657 | 21.9% |
| Persons without reported diagnosis encountered during examination and investigation of individuals and | | | |
| populations | 1,537 | 218 | 14.2% |
| Symptoms | 3,663 | 796 | 21.7% |
| Other | 16,588 | 2,823 | 17.0% |

Table K4: Claims in Error: Part A Inpatient Hospital PPS

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|---|---------------------------------|---------------------------------------|--|
| DRG Label | | | |
| All Codes With Less Than 30 Claims | 1,829 | 282 | 15.4% |
| Chest Pain (313) | 49 | 15 | 30.6% |
| Esophagitis, Gastroent & Misc Digest Disorders W/O Mcc (392) | 38 | 9 | 23.7% |
| Heart Failure & Shock W Cc (292) | 45 | 4 | 8.9% |
| Heart Failure & Shock W Mcc (291) | 54 | 5 | 9.3% |
| Kidney & Urinary Tract Infections W/O Mcc (690) | 36 | 5 | 13.9% |
| Legacy DRG Claims | 47 | 0 | 0.0% |
| Major Joint Replacement Or Reattachment Of Lower Extremity W/O Mcc (470) | 94 | 20 | 21.3% |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours W Mcc (871) | 65 | 9 | 13.8% |
| Syncope & Collapse (312) | 38 | 5 | 13.2% |
| Other | 158 | 22 | 13.9% |
| TOS Code | | | |
| All Codes With Less Than 30 Claims | 1,267 | 211 | 16.7% |
| Cardiac Arrhythmia & Conduction Disorders (308, 309, 310) | 67 | 6 | 9.0% |
| Chronic Obstructive Pulmonary Disease (190, 191, 192) | 76 | 3 | 3.9% |
| Heart Failure & Shock (291, 292, 293) | 120 | 10 | 8.3% |
| Intracranial Hemorrhage Or Cerebral Infarction (064, 065, 066) | 52 | 2 | 3.8% |
| Kidney & Urinary Tract Infections (689, 690) | 59 | 8 | 13.6% |
| Major Joint Replacement Or Reattachment Of Lower Extremity (469, 470) | 103 | 21 | 20.4% |
| Nutritional & Misc Metabolic Disorders (640, 641) | 63 | 10 | 15.9% |
| Septicemia Or Severe Sepsis W/O Mv 96+ Hours (871 , 872) | 78 | 10 | 12.8% |
| Simple Pneumonia & Pleurisy (193, 194, 195) | 71 | 6 | 8.5% |
| Other | 497 | 89 | 17.9% |
| Diagnosis Code | | | |

| Variable | Number of Claims Reviewed | Number of Claims Containing Errors | Percent of Claims Containing Errors |
|--|---------------------------------|---------------------------------------|--|
| Arthropathies and related disorders | 101 | 26 | 25.7% |
| Cerebrovascular disease | 99 | 6 | 6.1% |
| Chronic obstructive pulmonary disease and allied conditions | 88 | 4 | 4.5% |
| Complications of surgical and medical care, not elsewhere classified | 106 | 18 | 17.0% |
| Ischemic heart disease | 161 | 29 | 18.0% |
| Other bacterial diseases | 100 | 12 | 12.0% |
| Other diseases of urinary system | 81 | 15 | 18.5% |
| Other forms of heart disease | 254 | 43 | 16.9% |
| Pneumonia and influenza | 96 | 7 | 7.3% |
| Symptoms | 153 | 38 | 24.8% |
| Other | 1,214 | 178 | 14.7% |

Table K5 indicates types of claims included or excluded from the determination of each error rate for claim categories including: paid claims, no resolution of claim and provider compliance issues.

Table K5: Included and Excluded in the Sample

| Claim Category | Paid Line Items | Unpaid Line Items | Denied For Non-Medical Reasons | Automated Medical Review Denials | No Resolution | RTP | Late Resolution | Inpt, RAPS, Tech Errors |
|------------------------|-----------------------|----------------------|--------------------------------------|---|------------------|---------|--------------------|----------------------------------|
| Paid Claim | Include | Include | Include | Include | Exclude | Exclude | Exclude | Exclude |
| No Resolution | Include | Include | Include | Include | Include | Exclude | Include | Exclude |
| Provider Compliance | Include | Include | Include | Include | Exclude | Exclude | Exclude | Exclude |

Tables K6 through K8 indicate the number of claims that CMS included or excluded from the determination of each error rate by claim type: Part B, DME and overall Part A (including Inpatient Hospital PPS).

Table K6: Frequency of Claims that are Included and Excluded From Each Error Rate: Part B

| Claim Category | Included | Dropped | Total | Percent Included |
|---------------------|----------|---------|--------|------------------|
| Paid | 30,965 | 801 | 31,766 | 97.5% |
| No Resolution | 30,968 | 798 | 31,766 | 97.5% |
| Provider Compliance | 30,965 | 801 | 31,766 | 97.5% |

Table K7: Frequency of Claims that are Included and Excluded from Each Error Rate: DME

| Claim Category | Included | Dropped | Total | Percent Included |
|---------------------|----------|---------|--------|------------------|
| Paid | 11,996 | 176 | 12,172 | 98.6% |
| No Resolution | 12,006 | 166 | 12,172 | 98.6% |
| Provider Compliance | 11,996 | 176 | 12,172 | 98.6% |

Table K8: Frequency of Claims that are Included and Excluded From Each Error Rate: Part A including Inpatient Hospital PPS

| Claim Category | Included | Dropped | Total | Percent Included |
|---------------------|----------|---------|--------|------------------|
| Paid | 36,911 | 856 | 37,767 | 97.7% |
| No Resolution | 36,922 | 845 | 37,767 | 97.8% |
| Provider Compliance | 36,911 | 856 | 37,767 | 97.7% |