



# Comprehensive Error Rate Testing (CERT) Part B Update New York

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# CERT Process

- CERT Documentation Contractor (CDC)
- CERT Review Contractor (CRC)
- Randomly select sample of claims
- Request medical records from the billing provider
- Appeal Rights

# Error Rates

- May 2008 – Prior to J-13
  - Claims submitted 10/01/06 – 09/30/07
    - Legacy Empire – 6.8%
    - Legacy GHI – 6.7%
    - Legacy Health Now – 3.7%
- Current Error Rate - climbing

# Top Errors

- Evaluation & Management Services
  - Incorrect Coding
  - Insufficient Documentation
- Therapeutic Procedures
  - Insufficient Documentation
  - Incorrect Coding
- Ambulance Services
  - Not Medically Necessary
  - Insufficient Documentation

# Specialties with Most Dollars in Error

- Internal Medicine –
  - Estimated 25% of error rate
- Diagnostic Radiology –
  - Estimated 9% of error rate
- Cardiology –
  - Estimated 7% of error rate

# Suggested Documentation for E/M Services

- Provider progress notes & orders
- All orders for labs/tests/results etc.
- Documentation to support all additional services billed on claim
- Consultation order/report sent to referring MD

# Suggested Documentation for Lab, Diagnostic, and Therapeutic Services

## **One of the following must be submitted to show intent and medical necessity:**

- Order or requisition form with physician signature and diagnoses that necessitate the services billed
- Physician progress note of visit in which procedure was ordered or the visit following the test procedures showing physician's signature and medical necessity

# Suggested Documentation for Lab, Diagnostic, and Therapeutic Services Cont'd

- An electronic mail by the treating physician/practitioner or his/her office to the testing facility (include diagnoses)
- Screen print of electronic request by the physician
  - With electronic system requests, also include diagnoses and one of the following:
    - Copy of your protocol with requirement of physician logon ID and password to order the tests or procedures (Protocol can be sent once per provider.)
    - Evidence of physician entry into the request system with individual logon ID and password such as audit trail that proves the doctor entered the request for services electronically

# Recent Findings

- **Physician Signature Missing or Illegible**
  - Handwritten or electronic (stamp signatures are not acceptable)
- **What CERT will accept if signature is illegible**
  - Signature Key/Signature Page
    - Providers typed name, original signature, and initials
  - Documentation affirming provider signature
    - Must be written and signed by Provider or Compliance Officer

# Final Reminder

- If you bill it – you must be able to support it
- No records = no \$\$
- CERT data may be used as a Medical Review flag
- All CERT determinations have appeal rights.

# Additional Resources

- [www.cms.hhs.gov/cert](http://www.cms.hhs.gov/cert)
  - CERT information and CERT published reports
- [www.NGS Medicare.com](http://www.NGS Medicare.com)
  - CERT Alerts, CERT information, LCD, and NCD
- [www.certprovider.org](http://www.certprovider.org)
  - CERT newsletters, CERT sample letters, and provider address directory

# Additional Resources Cont'd

- National Government Services Clinical Provider Outreach and Education/CERT Toll-Free Line – All Contracts and Regions
  - 800-338-6101
- E-mail West, Midwest, All Contracts
  - [ClinicalEducation@wellpoint.com](mailto:ClinicalEducation@wellpoint.com)
- E-mail East, J-13 A and B, J-14 A
  - [EastClinicalEducation@wellpoint.com](mailto:EastClinicalEducation@wellpoint.com)