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Ambulance Claims Review



**El Paso Fire Department
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CONSULTANT REPORT

Ambulance Claims Review El Paso Fire Department

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Attachments:

A – Compliance Review Worksheet

B – RAT-STATS Supporting Documentation

INTRODUCTION

Fitch & Associates was engaged by the El Paso Fire Department to conduct an ambulance claims review for the El Paso Fire Department. We conducted the review as an Independent Review Organization (IRO).

This report contains the results of the Claims Review for 40 claims and 10 spares representing dates of service from October 1, 2014 through December 31, 2014.

CLAIMS REVIEW METHODOLOGY

SAMPLING UNIT

For the purposes of this review, an *Item* is defined as a claim filed with Medicare or Medicaid federal healthcare programs for a single ambulance transport. Each claim has two separate line item charges — ambulance base rate and mileage.

CLAIMS REVIEW POPULATION

The Claims Review Population consisted of all patient accounts paid by Medicare and Medicaid for the defined period. The period of claims ranged from October 1, 2014 through December 31, 2014. The review was based on a universe of 1978 claims representing ambulance transports.

CLAIMS REVIEW OBJECTIVE

An evaluation process was established to analyze each claim submitted to Medicare and Medicaid identified in a Sample of randomly selected claims.

The review process was established using risk areas identified by the Office of the Inspector General (OIG) in their Compliance Program Guidance for Ambulance Suppliers. Those determined to be pertinent areas of risk were included in the process. Particular attention was paid to the following risk areas:

- Billing for items or services not actually documented
- Mileage
- Unbundling
- Upcoding
- Failure to properly use modifiers
- Assumption coding
- Obtaining appropriate signatures

The specific objective of the claims review engagement is to determine whether claims for reimbursement submitted to Medicare and Medicaid are accurate and supported by proper documentation.

Each claim was examined and a compliance review worksheet was completed (see Attachment A). The reviewer then examined all submitted documentation for each ambulance transport. The review was designed to answer the following questions:

1. Is the mileage properly documented?
2. Is the reason for ambulance transport documented?
3. Are there appropriate HCPCS codes used for charges and are those charges supported by documentation?
4. Does the patient transport meet medical necessity criteria?
5. Are appropriate modifiers used to identify origins and destinations?
6. When required are Physician Certification Statements (PCS) provided, accurate, and complete?
7. Are appropriate signatures documented?
8. Were appropriate ICD-9 codes used in documenting the patients' diagnoses and conditions and are they supported by documentation?

SAMPLING FRAME

The Sampling Frame is identical to the Population and represents all claims for ambulance transports filed with Medicare and Medicaid. In this case, the Sampling Frame represents 1,978 claims.

The process to identify the Frame included a request for El Paso Fire Department to provide a list of all calls between October 1, 2014 to December 31, 2014 for claims that were billed to and paid by Medicare and Medicaid. All calls in this review were provided to patients who had Medicare or Medicaid as their primary source of insurance.

SOURCE OF DATA

All available documentation was requested for each account identified for the Claims Review. The following documentation included:

- CMS-1500 Health Insurance Claim Form
- The electronic Patient Care Report completed by ambulance crew members
- The Preliminary Patient Care Report
- Certificates of Medical Necessity (CMN)/Physician Certification Statements (PCS), if appropriate
- Explanation of Benefits (EOBs)/Remittance Advice (RAs)
- Hospital face sheets
- A patient invoice with payment history
- Physician order sheet, patient care flow sheets, and other medical records
- Multiple CMS and insurance company documents, web sites, and memorandum, including CMS rules for ambulance services
- Any other correspondence provided with the account

REVIEW PROTOCOL

A Discovery Sample of 40 claims and 10 spares was identified through the OIG's RAT-STATS statistical sampling software.

All the aforementioned documentation was requested from El Paso Fire Department for each of the 40 claims and 10 spares for ambulance transport. All requested documentation of 40 claims and 10 spares were received from El Paso Fire Department.

The information for each claim was entered into a spreadsheet (Attachment A). The spreadsheet included the following columns of required information and additional data to facilitate the review:

- Sample (Assigned) Number
- Patient Name
- Incident #
- Federal Program Billed
- Date of service
- Origin
- Destination
- Mileage (patient loaded miles)
- Mileage Supported by Documents?
- Reason for transport supported by documents
- Procedure Codes Submitted (HCPCS)
- Appropriate HCPCS (if different)
- Charges Supported by Documentation
- Documents Support Medical Necessity for Medicare
- Origin and Destination Modifiers
- Determination of Whether Modifiers are Correct
- Notation of Whether Physician's Certification Statement (PCS/CMN) is Present When Required
- Total Charges on Claims
- Amounts Allowed For the Charges by Medicare or Medicaid, Correct Allowed Amount (if different)
- Medicare payments
- Secondary Payers and Payments
- Notation on Whether Patient Signature was Acquired
- Submitted ICD-9 codes Used to Identify the Diagnoses Filed with the Claims
- Comments

A Fitch & Associates staff member entered the information including the procedure codes submitted to Medicare and Medicaid for reimbursement.

The reviewer examined the claims sequentially, based on the order the accounts were placed in the system. A total of 40 claims were reviewed. Spares were utilized as appropriate, and are detailed in a table below.

The next step was for the reviewer to examine each of the claims to determine the correct procedure code based on documented information in the patient care reports and to determine the correct reimbursement amount based on the selected procedure codes. This was done for all 40 claims in the sample.

The purpose of the review was to determine if the claims for reimbursement were supported with the appropriate documentation and the correct codes for services and diagnosis were used.

STATISTICAL SAMPLING DOCUMENTATION

A total of 40 claims were evaluated in the Discovery Sample. A copy of the RAT-STATS printout for randomly selecting the Sample is included in Attachment B. The sample includes 40 randomly selected claims and 10 spares from the list of 1,978 claims filed with Medicare and Medicaid.

CLAIMS REVIEW FINDINGS

The reviewer examined the documents for the Sample of 40 claims and 10 spares that were submitted by El Paso Fire Department to Medicare and Medicaid.

FINDINGS

The 40 randomly selected claims were given item numbers for reference. These numbers are included in the spreadsheet in Attachment A and are used in this report to identify specific claims. The following paragraphs summarize the findings regarding the key questions to be answered by the claims review.

Table 1. Spares Utilized

Item #	Spares Utilized	Reason
23	Removed account # 21920792 and replaced with 22120344.	PCR was not located.
27	Removed account # 21920792 and replaced with 22168933.	PCR was not located.

Mileage

The loaded miles documented on the Patient Care Report (PCR) were compared with actual miles submitted on claims.

There are no mileage errors made by El Paso Fire Department.

Underpayments

There are no underpayments regarding mileage.

Overpayments

There are no overpayments regarding mileage.

Reason for Transport

All 40 items reviewed have appropriate reason for transport stated by El Paso Fire Department EMS.

Underpayments

Of the 40 items reviewed, there are no underpayments regarding reason for transport.

Overpayments

Of the 40 items reviewed, there are no overpayments regarding reason for transport.

Documentation of Charges

There were 80 charges associated with the 40 transports. 40 of the charges were for mileage and 40 representing base rates. The following table reflects the charges by HCPCS codes and quantity of each code in the sample.

Table 2. HCPCS Codes Utilized

Description and HCPCS Code	Quantity
A0425-Mileage	40
A0426-ALS1 non-emergency	0
A0427-ALS1 emergency	24
A0428-BLS non-emergency	0
A0429-BLS emergency	16
A0433-ALS2	0
A0434-SCT	0
Total	80

The following table identifies the HCPCS coding errors.

Table 3. HCPCS Errors

Item #	HCPCS Error Reason
13	HCPCS code billed was A0427. No procedures documented to justify ALS 1 Emergency Transport. BLS Emergency Transport (A0429) is the correct service level. Refund Medicare primary payment \$362.21 and Medicaid secondary payment \$92.40. Re-file claim to Medicare with correct service level.
26	HCPCS code billed was A0427. No procedures documented to justify ALS 1 Emergency Transport. BLS Emergency Transport (A0429) is the correct service level. Refund Medicare primary payment \$341.43 and Medicaid secondary payment \$87.11. Re-file claim to Medicare with correct service level.

Underpayments

No underpayments were identified were identified for HCPCS coding errors.

Overpayments

Overpayments result in Medicare refunds of \$703.64 and Medicaid refunds of \$179.51 for HCPCS coding errors.

Claims are still within filing deadline to re-file corrected claims to Medicare at the appropriate service level for payment.

Medical Necessity and Coverage

Medical Necessity and Coverage is correct in all claims reviewed for El Paso Fire Department EMS.

Underpayments

No underpayments were identified for medical necessity.

Overpayments

No overpayments were identified for medical necessity.

Modifiers

Modifiers are entered on claims to identify the origin and destination of the ambulance transport. One item was identified with an incorrect modifier. The modifier used was for a different mode of ambulance transport, which would be a helicopter or fixed wing aircraft. Please see the table below for specific details. This error did not have a bearing on payment and cause no overpayment or underpayment for the claim.

Table 4. Modifiers

<i>Item #</i>	<i>Modifier Billed</i>	<i>Correct Modifier</i>	<i>Reason</i>
4	IH	SH	Modifier IH was used, but Big 8 Lowes does not appear to be a landing zone. "I" modifier is used for a different mode of ambulance, which is a helicopter or fixed wing plane. It appears the patient may have had a fall in Big 8 Lowes, and a fall the day before, but the narrative is unclear to the reviewer. Correct modifier would be SH (scene to hospital).

Diagnosis and Condition Coding

Primary diagnosis and condition coding is accurate on 39 of 40 claims reviewed. One (1) of the diagnosis used on the claims was determined to be inaccurate or incomplete. The Table below summarizes the diagnosis error.

Table 5. Diagnosis and Condition Coding

Item #	Diagnosis Code Billed	Corrected Diagnosis Code/Reason
39	298.8 – Brief psychotic disorder was billed as primary.	Primary diagnosis is documented 921.9 (eye injury), and secondary diagnosis is 780.97 (altered mental status).

2.5% of the condition codes reported was found to be not completely accurate. It is imperative for the billers/coders of ambulance transports to code the signs and symptoms displayed by the patient, as reported in the documentation, unless there is a physician rendered diagnosis as would be found in hospital to hospital transports. El Paso Fire Department should ensure their data files listing ICD-9 codes represent accurate and correct codes that are associated with the diagnosis or symptom.

Certificates of Medical Necessity/Physician Certification Statements

Ambulance services are required to have a physician (or other specified individual including registered nurses, etc.) certify that non-emergency ambulance transports are necessary when the patient is under the direct care of a physician. CMN/PCS forms are not necessary for emergency transports or when the patient is not under the direct care of a physician. The most pertinent trips are non-emergencies where the patient is being transported from a skilled nursing facility or hospital.

There were no transports which required a Physician Certification Statement.

Patient Signatures

Patient or authorized representative signatures or appropriate documentation of reasons why the signatures could not be obtained and acknowledgement of receipt of the patient by the receiving facility is necessary to appropriately file Medicare claims.

All patient signatures were appropriate.

Crew Signatures

There are crew signatures on all transports.

QUANTITATIVE RESULTS

Mileage errors: 0%
Documentation of Charges in error: 5%
Medically Necessary and Coverage errors: 0%
Modifier errors: 2.5%
Diagnosis and Condition coding errors: 2.5%
Patient Signature: 0%
PCS Error Rate: No transports requiring PCS's

CONCLUSION

Mileage was documented accurately on 40 of the 40 claims reviewed. Fractional mileage is required for Medicare claims and El Paso Fire Department demonstrates clear understanding in this area.

HCPCS codes are billed in error on 2 claims reviewed. This represents 5% of cases for El Paso Fire Department. In both cases, A0427 (ALS 1 Emergency Transport) was billed, when, on both claims, A0429 (BLS Emergency Transport) is correct. All payments to primary and secondary payers need to be refunded for these two claims and as the dates of service are still within the filing deadline, claims should be re-filed to Medicare at the correct service level. It is extremely pertinent that HCPCS codes are documented and billed correctly according to federal guidelines. Additional education may be necessary to ensure proper coding and documentation excellence.

Medical necessity and coverage was found accurately documented on all 40 claims. Medical necessity is the driving force behind many governmental audits and El Paso Fire Department demonstrated understanding in this area.

ICD-9 codes are identified as billed inappropriately or inaccurately used on 1 of the 40 claims reviewed. The primary ICD-9 code should be the signs and symptoms for the transport, unless otherwise stated on the PCS for transport to another facility or residence.

PCS errors are 0, as no transports required Physician Certificate Statements.

Medicare regulations require that all services provided to a Medicare beneficiary be documented in the provider's medical records, and that all medical records be "authenticated" by the author. The requirement is met by having the ambulance crewmembers sign the trip report. It is also recommended that crewmembers list their licensure (e.g., EMT-B, EMT-P, etc.) on the trip report. **Note:** the Medicare requirement is in addition to any requirements imposed by your state regarding the authentication of trip reports (AAA Medicare Reference Manual 2014 P. 29). El Paso Fire Department was significantly compliant in obtaining all required signatures in the charts reviewed.

ATTACHMENT A

Compliance Review Worksheet

4	21362781	CARE	10/3/2014	A0425		\$90.00		\$37.95			\$29.75	CARE	\$7.59	CAID	\$0.00	839.8
				A0429		\$785.00		\$335.39			\$262.94		\$67.08			
5	21362881	CARE	10/3/2014	A0425		\$45.00		\$20.76			\$16.28		\$0.00	NA	\$83.81	250.32
				A0427		\$785.00		\$398.28			\$312.25					
6	21371726	CARE	10/5/2014	A0425		\$75.00		\$29.36			\$23.02		\$5.87	CAID	\$0.00	787.01
				A0427		\$785.00		\$398.28			\$197.00		\$197.26			
7	21382550	CARE	10/6/2014	A0425		\$90.00		\$39.38			\$30.87		\$7.88	CAID	\$0.00	787.01
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
8	21392370	CAID	10/7/2014	A0425		\$15.00		\$5.06			\$4.71		NA	NA	\$0.00	780.39
				A0427		\$785.00		\$306.75			\$285.28					
9	21407199	CARE	10/8/2014	A0425		\$60.00		\$25.06			\$19.65		NA	NA	\$72.09	305.00

				A0429		\$785.00		\$335.39			\$262.94					
10	21427470	CARE	10/10/2014	A0425		\$105.00		\$50.01			\$39.30		\$10.02	CAID	\$0.00	799.02
				A0429		\$785.00		\$335.39			\$262.94		\$67.08			
11	21440911	CARE	10/11/2014	A0425		\$210.00		\$96.66			\$75.78		\$19.33	BCBS	\$0.00	458.9
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
12	21441768	CARE	10/12/2014	A0425		\$180.00		\$85.92			\$67.37	CARE	NA	NA	\$84.26	459.0
				A0429		\$785.00		\$335.39			\$262.94					
13	21464618	CARE	10/14/2014	A0425		\$135.00		\$63.72			\$49.96	CARE	\$12.74	CAID	\$0.00	959.7
				A0427	A0429	\$785.00		\$398.28	335.39		\$312.25		\$79.66			
14	21487325	CARE	10/15/2014	A0425		\$225.00		\$105.97			\$83.08		\$21.19	BCBS	\$0.00	724.5

26	21900855	CARE	11/16/2014	A0425		\$90.00		\$37.23			\$29.18	CARE	\$7.45	CAID	\$0.00	959.01
				A0427	A0429	\$785.00		\$398.28	335.39		\$312.25		\$79.66			
27	22168933	CARE	12/11/2014	A0425		\$180.00		\$84.49			\$66.24	CARE	\$16.90	AARP	\$0.00	799.02
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
28	21947132	CARE	11/20/2014	A0425		\$15.00		\$2.86			\$2.24	CARE	\$0.00	NA	\$80.23	458.9
				A0427		\$785.00		\$398.28			\$312.25					
29	21947269	CARE	11/20/2014	A0425		\$90.00		\$38.66			\$30.21	CARE	\$7.73	BCBS	\$0.00	839.8
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
30	21996703	CARE	11/24/2014	A0425		\$195.00		\$58.17			\$0.00	CAID`	\$0.00	NA	\$0.00	839.8
				A0429		\$785.00		\$228.22			\$228.22					

31	21997455	CAID	11/25/2014	A0425		\$30.00		\$0.00			\$0.00					780.39
				A0427		\$785.00		\$271.02			\$271.02	CAID	\$0.00	NA	\$0.00	
32		CARE	11/18/2014	A0425		\$45.00		\$15.04			\$11.79	CARE	\$3.01	CAID	\$0.00	458.9
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
33	22008514	CARE	11/25/2014	A0425		\$75.00		\$35.80			\$28.07	CARE	\$0.00	NA	\$86.82	789.09
				A0427		\$785.00		\$398.28			\$312.25					
34	22022959	CARE	11/27/2014	A0425		\$90.00		\$41.53			\$32.56	CARE	\$8.31	AARP	\$0.00	786.09
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
35	22035635	CARE	11/28/2014	A0425		\$75.00		\$35.80			\$28.07		\$7.16	Conseco	\$0.00	959.01
				A0429		\$785.00		\$335.39			\$262.94		\$67.08			
36	22045082	CARE	11/30/2014	A0425		\$90.00		\$36.52			\$28.64		\$7.30	Tricare for Life	\$0.00	789.67

				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
37	22050598	CARE	11/30/2014	A0425		\$45.00		\$15.04			\$11.79		\$3.01	BCBS	\$0.00	785.0
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			
38	22091267	CARE	11/26/2014	A0425		\$150.00		\$71.60			\$56.13		\$0.00	Tricare	\$93.98	427.81
				A0427		\$785.00		\$398.28			\$312.25					
39	22119295	CARE	12/7/2014	A0425		\$120.00		\$52.27			\$40.98		\$10.45	AARP	\$0.00	298.8
				A0429		\$785.00		\$335.39			\$262.94		\$67.08			
40	22120221	CARE	12/6/2014	A0425		\$60.00		\$26.49			\$20.77		\$5.30		\$0.00	959.01
				A0427		\$785.00		\$398.28			\$312.25		\$79.66			

ATTACHMENT B

RAT-STATS Supporting Documentation

Windows RAT-STATS

Statistical Software

Random Number Generator

Date: 2/11/2015

Time:

8:14

Audit: City of El Paso Oct-Dec 2014

Order	Value	El Paso/Intermedix Acct Number	Seed Number	Frame Size
7	12	22377219	29645.72	1,978
8	33	21996703		
5	112	21586983		
29	114	21617020		
38	147	21997455		
42	153	22231902		
31	217	21407199		
3	251	21392370		
32	290	21341260		
9	341	21631411		
12	370	21947132		
14	465	21362881		
41	478	21441768		
1	510	22334198		
40	591	22008514		
22	600	22045082		
47	648	21496724		
49	673	21521104		
2	779	22344119		
21	794	21893327		
44	851	21497769		
13	855	22218666		
46	886	22035635		
43	896	21906976		
34	907	21362781		
50	919	22091267		
48	935	21703545		
23	942	22240521		
17	979	21427470		
15	986	22357150		
6	995	22119295		
18	1032	22120344		
24	1139	21355554		
26	1232	22050598		
25	1235	21921969		
33	1237	21920792		
39	1300	21536358		
37	1350	22177653		
28	1396	22120221		
36	1424	21334375		
16	1503	21371726		
10	1533	21703292		
19	1602	21900855		
4	1611	21947269		
45	1614	21382550		
30	1635	22022959		
11	1659	21487325		
27	1813	21464618		
35	1898	22168933		
20	1920	21440911		



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