Transcript for the CBR202007: Therapeutic Injections and Infusions

Thank you for joining us today! Welcome to our webinar, where we'll be discussing Comparative Billing Reports, or CBRs, and more specifically, *CBR202007: Therapeutic Injections and Infusions*. My name is Annie Barnaby, and I work for RELI Group, Inc., who is contracted with the Centers for Medicare & Medicaid Services (CMS) to develop, produce, and distribute CBR reports.

We have developed various resources to accompany this webinar, and those resources are listed here for your convenience. We do have the webinar slides available to you in a file that is posted to our website. If you have a question about the CBR topic, the CBR Help Desk can help answer those inquiries. You can go to the link shown on this slide, and submit a ticket, and we will be happy to respond and help with any inquiries you may have.

The objectives of today's webinar will be to understand the purpose and use of Comparative Billing Reports, CBRs, to explain the function of this specific Comparative Billing Report *CBR202007: Therapeutic Injections and Infusions*, and to help you gather resources that will help answer further questions and inquiries.

To accomplish those objectives, our discussion today will cover the following areas. First, we'll talk about what a Comparative Billing Report (CBR) is. I will show you how to access your CBR. I do have a sample CBR that we will review, so that we can get a good sense of what we're looking at when we review a CBR. Then, we will go into a discussion of this CBR, and go through the details of the topic and metrics for *CBR202007*. And finally, I will show you some helpful resources, should you have any questions following the webinar. Let's get started!

Let's start at the very beginning; what is a CBR? Well, CBR stands for Comparative Billing Report. And, according to the CMS definition, a CBR is a free, comparative data report, that can be used as an educational resource, and a tool that providers can use for possible improvement. A CBR is truly just what the titles says—a report that compares providers on a state or specialty and nationwide level and summarizes one provider's Medicare claims data statistics for areas that may be at risk for improper Medicare payment. Primarily in terms of whether the claim was correctly coded and billed and whether the treatment provided to the patient was necessary and in line with Medicare payment policy. A CBR cannot identify improper payments, but it can alert providers if their billing statistics look unusual as compared to their peers.

Taking a look at the history of the CBR, we can see that this program was spearheaded in 2010. In 2018, CMS combined the CBR program with the PEPPER program, which is the program for Evaluating Payment Pattern Electronic Reports, to put both programs under one contract. And

then, beginning in 2019, RELI Group has partnered with TMF and CGS to create and distribute CBRs and PEPPERs.

Now that we have a sense of the history of the CBR, we can discuss why CMS issues CBRs. Well, CMS is mandated and required by law to protect the Trust Fund from any improper payments, or anything else that may compromise the Trust Fund. CMS employs a number of strategies to meet this goal, which include education of providers, early detection through medical review, and data analysis. And CMS considers the CBR process to be an educational tool that supports their efforts to protect the Trust Fund. CBRs serve several purposes on the provider side as well. The CBR program helps to support the integrity of claims submission, and the adherence to coding guidelines. This helps to encourage correct clinical billing. Early detection of any outliers in your billing processes can help to guide a compliance program that will help to support compliant operations in your own organization, and taking a closer look at specific coding guidelines and billing procedures can increase education and improve future billing practices.

You may be asking yourself "why do providers receive CBR reports?" A CBR is presented to a provider when the analysis of their billing patterns differs from the provider's peers on a state, specialty, and/or a nationwide level. The analysis of providers' billing patterns is completed through each CBR topic, and each CBR is distributed to providers based on individual provider results for specified metrics within the CBR. The metrics for every CBR are created according to the CBR topic and the potential risk to the Trust Fund. It is important to always remember that receiving a CBR is NOT in any way an indication of, or precursor to, an audit.

I am going to walk through the steps of accessing your report, if you received one, so we can see exactly how that's done. This page, cbrfile.cbrpepper.org, contains the portal that you'll use to access your CBR. The portal does require that you enter some information; and I'm going to open this page on my screen to show you exactly what it looks like when a CBR is accessed in this way. First, we'll indicate the role that we play within the healthcare organization for the physician or physicians who received a CBR. I'm going to indicate that I am the CEO of the organization, and by doing so, I am indicating that I have the authority to receive the CBR information, and that I understand that I am authorized to view this confidential information. Next, I'll complete these two forms to indicate my information, and the provider information. To access this test CBR, I of course have used "test" data to complete these forms, but you'll use the correct information here to complete them. Following these forms, we're going to indicate how we heard about the CBR that is available for the physician or physicians. This section of the access form is most telling to us, and helps us to know which form of alert is working best to reach the most physicians for their CBR alert.

First on the list indicates that you received an email, a fax, or a letter. These would be communications that came to the contact information that is listed in the Provider Enrollment, Chain and Ownership system, that's commonly known as PECOS. We do encourage everyone to

confirm their PECOS information, and update if necessary, so that we can contact the appropriate person regarding CBR information. Confirming this information several times a year allows for that contact information to stay up to date and lessens any issues that may arise otherwise.

Next on this list is indication that you saw a tweet that we sent out about the CBR program. We do tweet about the CBR releases, and about these webinars, so if you saw the tweet, and that led you to check out the CBR program, we'd love to know that.

The next two entries, provider or professional association, or MAC notice, are indications of our work alongside the groups and the MACs that are so supportive of provider billing, and information distribution. We are very appreciative whenever MACs are involved in spreading the word about the CBR program, and similarly when a professional association recognizes the importance of the CBR program and the information that we distribute. We do have one alternative option, "other," and if that option applies, of course, please indicate as such.

At the bottom of the form, we ask for the provider's NPI number. This will be the NPI number for the specific provider who received the CBR. And I, of course, am using a standard test code for the NPI number.

Then at the very bottom of the form, we finally have the validation code. When a provider receives an alert that they have a CBR on file, a validation code is included with that alert information. So, again, check the information on the emailed alert, the faxed alert, the letter to confirm your validation code. If you are sure that an individual provider was issued a CBR, but you are unsure of the validation code, please submit a ticket to our Help Desk and we can assist with resolving that issue.

So, I'm going to complete the form, and hit submit. And here we have the sample CBR file that appears. And your CBR will appear in the same fashion, in PDF format ready for your review.

This page, cbrpepper.org, is another page that you can use to access your CBR. If you click on the "Access your CBR" button highlighted here with the purple arrow, you'll be directed to the page that we just reviewed, the portal, and you can begin the steps we just covered.

So, we've seen how to access the CBR report; let's now take a closer look at the sample document, so we can fully understand this CBR, it's metrics, outcomes, and comparisons. The results shown on this CBR will of course differ from those on your CBR, if you received one, but the formatting and sections on your CBR will be consistent with this layout of this sample document.

This CBR is formatted into five sections, which help to focus on the process and results of the CBR. Let's go now to the sample document, so we can follow along and look as we talk about each section. We start of course with the introduction. The Introduction is a brief explanation of

the specific clinical area addressed in the CBR, in this case of course it is therapeutic injection or infusion services on the same day as an evaluation and management encounter. You can see here, also, information regarding projected improper payments, and information from the National Correct Coding (NCCI) Manual, and information from the *2019 Medicare Fee-for-Service Supplemental Improper Payment Data* report. The introduction also contains the criteria for receiving a CBR, and we'll go into much more detail about that later on in the presentation.

Moving on to the coding and document — the coverage and documentation overview. This section identifies the CPT® codes that were analyzed in the report, and several reports and references from CMS that discuss the CBR topic, you can see those here at the bottom of this page. Tables 1 and 2 are listed in this section; Table 1 contains detailed descriptions of the injection and infusion CPT® codes, you can see those here. Table 2 contains the information for this sample provider for the allowed charges, allowed units, and beneficiary count during the analysis timeframe.

The metrics of the CBR lists and explains the metrics used for the CBR, the definitions for the state and national peer group, and the possible outcomes for the CBR metric analyses. The methods and results section is a review of the results for the CBR analysis, followed by individual results comparing the CBR recipient to other providers. We have an explanation of the dates of service included in the report analysis, and the total rendering providers who had allowed charges for therapeutic injection or infusion services. Following that information, then, each metric is explained, the calculation for the metric is described, and then the results for the provider for each metric is shown in table form. You can see here, for Metric 1, the description, the calculation, and then the results. And that repeats for Metrics 2 and 3 as well. This section also provides a graph displaying the trend over time for the provider; we'll discuss this table in a bit more detail later on in the webinar. Finally, the references and resources section lists reports and documents used for the creation CBR, and those created to help you as you have questions about this CBR.

Let's take a look now at the vulnerability of correct payments for therapeutic injection or infusion services performed on the same day as evaluation and management services, and how that plays into CMS's protection of the Trust Fund. We saw in the introduction, information regarding the NCCI policy manual, and the claims — *Medicare Claims Processing Manual*. And truly, those two manuals and the guidance they provide is at the heart of the vulnerability for therapeutic injections or infusions. The guidance towards billing an E/M service on the same day as an injection or infusion stems from the E/M service being significantly and separately identifiable. While this is a possibility, it probably is not likely that these separately identifiable E/M services are being provided every time an injection or infusion is performed, nor is it likely that the E/M service would be medically necessary on the majority of occasions, which plays into the guidance that we see in the *Medicare Claims Processing Manual*.

To look at the level of claims and allowable amounts for therapeutic injection or infusion services, the *CBR202007* was created. The CBR analyzes and reviews statistics for rendering providers who performed therapeutic injection or infusion services.

To create the *CBR202007* and the metrics within the report, we used detailed information for that data during the CBR summary year of March 1, 2019, through Feb. 29, 2020. The results were based on claims extracted for the date range as of May 18, 2020. Those results showed that over 225,000 providers submitted these claims, which represent over $334 million in allowed charges. When we talk about allowed charges, we're referencing the allowed charges listed in the Medicare fee schedule. This lets us compare similar charge figures across all providers and claims submissions regardless of the submitted or paid amount.

This is a list of the metrics analyzed within this CBR. Each metric was created to take a more detailed look at the submission of claims with injections or infusions on the same day as an evaluation and management service. The metrics are the percentage of claims for injections or infusions billed on the same day as an E/M encounter, the average allowed charge amount for injections or infusions billed with an E/M encounter, the percentage of beneficiaries who received an injection or infusion code and an E/M encounter on the same day. We'll break down how each of these metrics is calculated later in the presentation, but first let's take a look at each metric to understand why each analysis was selected and analyzed.

Metric 1 looks at the percentage of claims for injections or infusions billed on the same day as an E/M encounter. This metric tell us, of all the injections and infusion services performed through the analysis year, what percentage of those had an evaluation and management service performed on the same day.

Metric 2 looks at the average allowed charge amount for injections or infusions billed with an E/M encounter. This metric helps us to look at the dollar amount attached to the therapeutic injections and injections submitted on the same day as an evaluation and management code.

And, Metric 3 looks at the percentage of beneficiaries that received an injection or infusion code and E/M encounter on the same day. This final metric lets us take a step back to examine the beneficiaries who received the injection or infusion services; what percentage of the beneficiaries that received an injection or infusion had the service on the same day as an evaluation and management encounter?

Looking at the metrics and their role in the CBR topic helps us to understand the criteria for receiving a *CBR202007*. Using all of the data and research, the CBR team created criteria to select the providers who will receive a *CBR202007*. That criteria is that the provider is significantly higher compared to either state or national averages in any of the three metrics i.e., greater than or equal to the 90th percentile, and has at least 30 total beneficiaries with claims for CPT® codes 96365 through 96377, and has at least $1,300 or more in total allowed

charges. Following our discussion of each metric, you can see that the criteria is directly related to the outcomes of the metrics. The criteria states that the provider must be significantly higher, or greater than or equal to the 90th percentile compared to the state or national average in any of the metric outcomes. So, what does the term "significantly higher" and "greater than or equal to the 90th percentile" mean, and what are the other outcomes for the metrics?

To answer that question, all four outcomes are listed here. These outcomes are the basis of the comparisons made regarding the provider's billing patterns and those of their peers. The four outcomes that can come of each metric analysis are significantly higher, which means the provider's value is greater than or equal to the 90th percentile from the state or national mean. Higher, which means the provider's value is greater than the state or national mean. Does Not Exceed, which means the provider's value is less than or equal to the state or national mean. And then, not applicable means that the provider does not have sufficient data for comparison. The significantly outcome—the significantly higher outcome indicates that the provider's value is greater than or equal to the 90th percentile from the peer state or national mean. In order to talk exactly about how we calculate the 90th percentile, let's go to our next slide.

I think that the visual on this slide can help us to understand the true meaning of the 90th percentile. It is important to fully understand these outcomes, as they are criteria for receipt of a CBR. In order to identify the providers who were above the 90th percentile, we calculated values for all providers for each of the metrics in each comparison group, which would be the peer state and nation. We then order all of the providers' values from highest to lowest. If you use the ladder visual as a reference, imagine that the highest values are listed at the top of the ladder, and then in a list in descending order down the length of the ladder, so the smallest values are at that bottom rung. Next, we identify the value below which 90% of the providers' values fall. This is the 90th percentile mark, represented above on the ladder visual by the black line. Any outcome for a metric in which the provider's value falls above that point would therefore have the outcome of significantly higher for the metric**.** Let's look at each metric individually, and the outcomes for the sample provider on our sample CBR.

Looking first at Metric 1, percentage of claims for injections or infusions billed on the same day as an E/M encounter. To calculate Metric 1, the count of unique claims where injection or infusion was billed on the same day as an E/M encounter is divided by the count of unique claims for injections or infusions. Looking at the sample figures on the CBR for Metric 1, you can see that this provider has a percentage of 5.67. With the state percentage falling at 41.31, and the national percentage at 50.05, the outcome of this metric for this provider is does not exceed.

Next, we have Metric 2, average allowed charge amount for injections or infusions billed with an E/M encounter. Metric 2 is calculated by dividing the total allowed charge amount for injection or infusion services when an E/M encounter is billed on the same day by the total

unique claims when an injection or infusion was billed on the same day as an E/M encounter. With that in mind, let's see where the sample provider fell with their results. Those results are on Table 4, on page 6, and we can see that this provider's average is $75.06. The state average is around $20 and national average is $19.40. These results produced an outcome of significantly higher for this metric for the sample provider.

Finally, we arrive at Metric 3, percentage of beneficiaries that received an injection or infusion code and E/M encounter on the same day. This metric was calculated by dividing the number of unique beneficiaries who received an injection or infusion on the same day as an E/M encounter by the total number of unique beneficiaries who received an injection or infusion service. Let's see the sample figures on the CBR for Metric 3. This provider had an outcome of 30.43 percent for this metric. The state percentage is 73.39 and the national percentage is 79.70, so this brings a result of does not exceed for this provider for both the state and national comparisons.

The CBR does include a graph that represents the provider's billing trend, over the three years 2017 to 2020, for total number of beneficiaries for whom CPT® codes 96365 through 96377 were submitted. After the detail of the metrics and analysis, it is nice to have this graph that takes a step back and reviews an overall analysis for that three-year period of time. And we can see this provider has a pretty steady number of beneficiaries over those three years.

At this point, I want to review the resources we have available to you if you received a CBR, or even if you would just like further information about the process. We have a helpful resources page cbr.cbrpepper.org/Help-Contact-Us. On this page, you'll find frequently asked questions link, and a link to submit a new Help Desk request. I always encourage people to review the frequently asked questions before submitting a Help Desk ticket, because those frequently asked questions may be able to answer your inquiry.

Here is a closer look at the frequently asked questions page cbr.cbrpepper.org/FAQ. This page contains the list of frequently asked questions and has links to answers to various questions that you can see here. Simply click on the question and the answer will populate. This list has proven helpful to many people who have questions about the CBR process.

These helpful resources are the documentation and reporting that the CBR team used in the creation and analysis of the CBR. You'll see the NCCI Manual, the *Medicare Claims Processing Manual*, the *Medicare Fee-for-Service Supplemental Improper Payment Data* report, and the guidance regarding evaluation and management code assignment and selection.

This is a screenshot of our homepage, cbr.cbrpepper.org/Home. There are sections for each of the CBRs that we have released in 2019 and 2020. For each CBR topic and release, we provide links to a sample CBR, the training materials, the data set, and a link to access your CBR. This page also contains a link to join our mailing list to stay up to date on any announcements, a link

to provide feedback on the CBRs, and a link to submit a CBR success story. We would love to hear how the CBR process worked for you and your organization.

Again, thank you for joining us today. And please remember, if you have any questions, you can submit them to our Help Desk at cbr.cbrpepper.org/Help-Contact-Us.