# CBR202108: Impact of the Public Health Emergency (PHE) on Telehealth

# Webinar Resources

Webinar slides

Webinar recording and handout

Coding guidance document

Webinar Q&A will be posted at
[CBR.CBRPEPPER.org](CBR.CBRPEPPER.org)

CBR Help Desk:
[https://cbr.cbrpepper.org/Help-Contact-Us](https://cbr.cbrpepper.org/Help-Contact-Us)

# Webinar Objective

- Understand the purpose and use of Comparative Billing Reports (CBRs).

- Comprehend the function of *CBR202108: Impact of the Public Health Emergency (PHE) on Telehealth*.

- Gather resources for further questions and inquiries.

# Webinar Agenda

- What is a CBR?

- How to access your CBR

- Review a sample CBR

- *CBR202108*

- Helpful resources

# The CMS Definition of a CBR

- CBRs are free, comparative data reports.
- The Centers for Medicare & Medicaid Services (CMS) defines a CBR as an educational resource and a tool for possible improvement.

# History of the National CBR Program

The national CBR program is separate and not related to comparative billing reports that are produced by Medicare Administrative Contractors (MACs) in support of their individual provider education activities.

**2010**
- CMS implemented a national program to produce and disseminate CBRs to physicians, suppliers, pharmacies, and other health care providers.

**2018**
- CMS combined the CBR and the Program for Evaluating Payment Pattern Electronic Reports (PEPPER) programs into one contract.

**2019**
- RELI Group and its partners—TMF Health Quality Institute and CGS—began producing CBRs and PEPPERs.

# Why does CMS issue CBRs?

**CBRs provide value to both CMS and providers.**

## Value to CMS

- Supports the integrity of claims submission
- Summarizes claims data
- Provides an educational resource for possible improvement by providing coding guidelines information

## Value to Providers

- Reflects providers' billing patterns as compared to their peers
- Provides information about vulnerabilities to the Medicare Trust Fund
- Informs providers whose billing patterns differ from those of their peers

# The Purpose of *CBR202108*

- Provide education to providers

- Increase providers' awareness about utilization of professional telehealth services during the PHE

- Reference guidelines for billing professional telehealth services during the PHE

# Five Things a CBR Is Not

An indication of wrongdoing

An audit

A medical review CBR

A prompt to change your clinical care

A request for a response

# Why did I receive a CBR?

- A CBR was issued to provide education to providers.
  - Receiving a CBR is not an indication of or precursor to an audit.

# The Importance of Downloading Your CBR

- Download your CBR from the CBR Portal: https://cbrfile.cbrpepper.org/.

- Guarantee the availability of the CBR to any department or employee tasked with reviewing it.

- Provide easy access for compliance reviews.

# How to Access Your CBR
## https://cbrfile.cbrpepper.org/



**CBR Portal**

Our Team is committed to ensuring and maintaining the confidentiality of each provider's Comparative Billing Report (CBR). All CBR recipients are expected to maintain and safeguard the confidentiality of privileged data or information.

I certify that I am the ☐ CEO   ☐ President   ☐ Administrator   ☐ Compliance Officer   ☐ Owner/Healthcare Provider

and that I have the actual authority to receive this CBR and all other confidential information concerning this health care provider. If a provider does not have a management position with any of these titles, the person who has the authority to make decisions on behalf of the provider should check the box for the title that best describes their position.

### Your Information

First Name

Last Name

Email

Confirm Email

### Provider Information

Provider Name

Provider City

Provider State / Territory

How did you learn about your CBR?
- ☐ Received an email notifying me that I had a CBR
- ☐ Received a fax notifying me that I had a CBR
- ☐ Received a letter via mail notifying me that I had a CBR
- ☐ Received a tweet from CMS that prompted me to check for a CBR
- ☐ From my national or state provider/professional association
- ☐ Received a notice from my Medicare Administrative Contractor (MAC)
- ☐ OTHER

CMS National Provider Identifier (NPI)

Optional: Search for an NPI at the NPI Registry.

Validation code

**SUBMIT**

# CMS Guidelines During the PHE

- CMS disseminated guidance about billing for professional telehealth services during the PHE in the March 31, 2020, release of the *Special Edition MLN Connects®* and updated that guidance in the April 3, 2020, release of the *Special Edition MLN Connects®*:
  - "Building on prior action to expand reimbursement for telehealth services to Medicare beneficiaries, CMS will now allow for more than 80 additional services to be furnished via telehealth…[Providers should] bill with:
    - Place of Service (POS) equal to what it would have been had the service been furnished in-person
    - Modifier 95, indicating that the service rendered was actually performed via telehealth."

# *CBR202108* Current Procedural Terminology® (CPT) Codes

| CPT® Codes | Description |
|---|---|
| **99201-99205** | Office or other outpatient visit, new patient |
| **99212-99215** | Office or other outpatient visit, established patient |

# *CBR202108* Outline

1. **Introduction**
   - Explanation of CBR focus and billing area vulnerability
   - Criteria for receipt of a CBR

2. **Coverage and Documentation Overview**
   - Identification of CPT® codes
   - Summary of provider's utilization

3. **Methods and Results**
   - Overall analysis results
   - Individualized results comparing CBR recipients to other providers

4. **References and Resources**
   - Resources used for the CBR

# CBRs and the PHE

- This CBR provides data regarding your claims submission, as compared to other providers' claims submission within your state and in the nation.

- The report is offered to facilitate an analysis of your billing submissions during a timeframe that occurred during the PHE.

- Please consider how your billing practices have changed during the PHE when you review the data within this report.
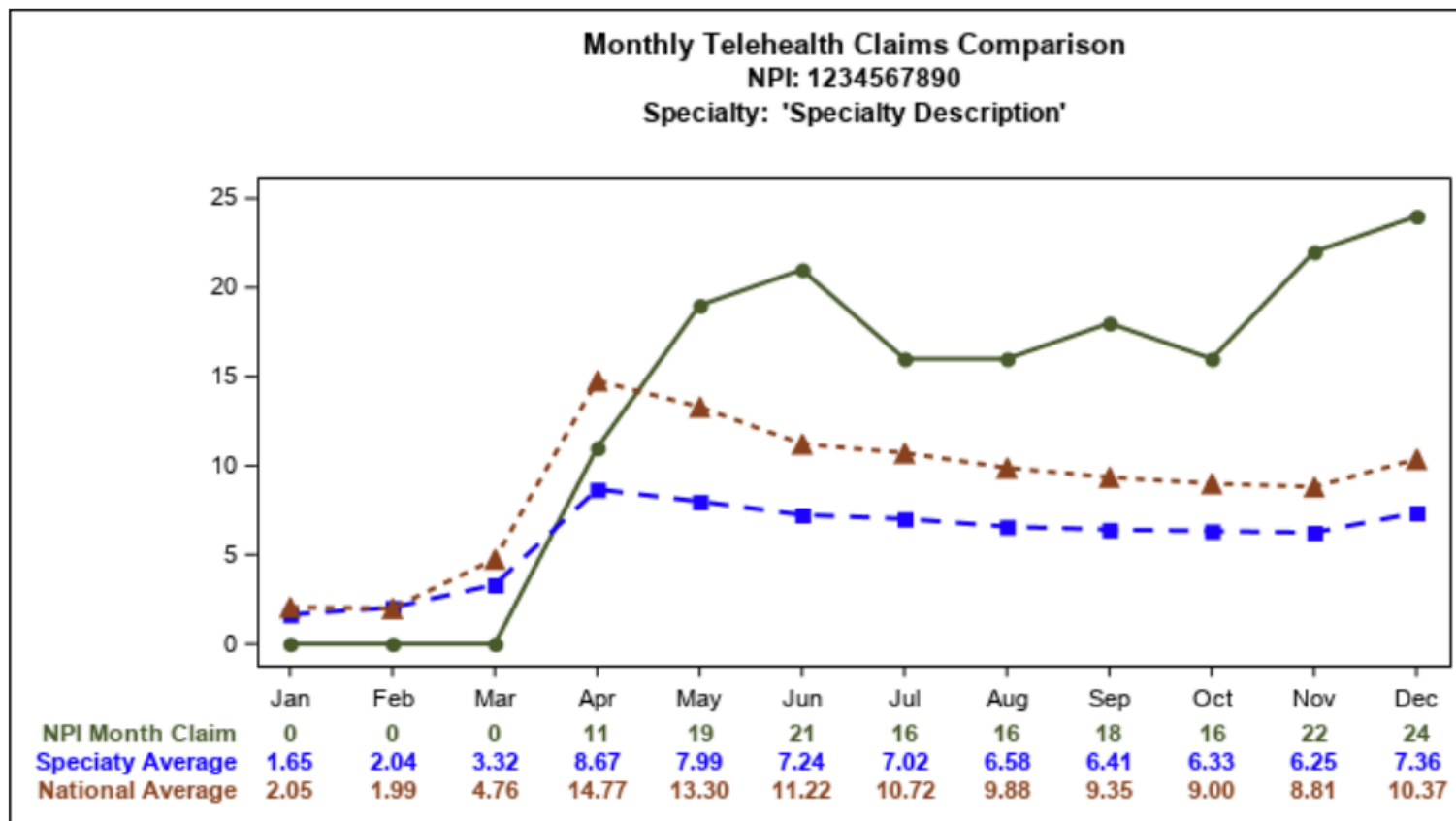
# *CBR202108* CBR Provider and Analysis Focus

- *CBR202108* analyzes the following:
  - Rendering providers that submitted Medicare Part B claims for CPT® codes 99201 – 99205, 99212 – 99215 with the addition of a Modifier 95 and a POS 11 (i.e., "Office").

- Services with dates of service from Jan. 1, 2020, through Dec. 31, 2020.

# The Criterion for Receiving *CBR202108*

- The criterion for receiving *CBR202108* is that the provider is in the top 5% of providers by claims volume within the top 25 specialties for the submission of CPT® codes 99201 – 99205, 99212 – 99215 with a Modifier 95 and POS 11 during the PHE.

# *CBR202108* Provider Trend Figure

## Figure 1: Average Monthly Telehealth Claims



**Monthly Telehealth Claims Comparison**
**NPI: 1234567890**
**Specialty: 'Specialty Description'**

| | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **NPI Month Claim** | 0 | 0 | 0 | 11 | 19 | 21 | 16 | 16 | 18 | 16 | 22 | 24 |
| **Speciaty Average** | 1.65 | 2.04 | 3.32 | 8.67 | 7.99 | 7.24 | 7.02 | 6.58 | 6.41 | 6.33 | 6.25 | 7.36 |
| **National Average** | 2.05 | 1.99 | 4.76 | 14.77 | 13.30 | 11.22 | 10.72 | 9.88 | 9.35 | 9.00 | 8.81 | 10.37 |

# The Importance of the CBR Outcomes

- CBRs are educational and comparative tools for providers.

- A CBR can help providers:
  - Ensure claims are correctly submitted to Medicare,
  - Complete self audits for compliance purposes, and
  - Review and confirm the importance of proper documentation and code assignment.

# CBR Help Desk

https://cbr.cbrpepper.org/Help-Contact-Us

## CBR Help Desk

Welcome to our support page. View a list of frequently asked questions or click on the button below to submit your question.

Prior to submitting a request for assistance, to reduce the possibility that email replies from our help desk are blocked due to tightened email security (strong spam filters), please add our email Internet domain @tmf.org to your email Safe Senders List.

**Submit a New Help Desk Request**

**Frequently Asked Questions**

![CBR Comparative Billing Reports logo]

# Frequently Asked Questions
## https://cbr.cbrpepper.org/FAQ

## Frequently Asked Questions

The following questions represent frequently asked questions (FAQs) from the provider community about Comparative Billing Reports (CBRs) and the CBR project in general. FAQs pertaining to a specific CBR release/topic are available with the resources specific to each CBR release/topic.

| + | What is a CBR? |
| + | Why am I getting this report? |
| + | I have a question about the CBR I received. Who should I contact? |
| + | Can I get specific claim data related to this report? |
| + | I have a question about my claims. Who should I contact? |
| + | I did not receive a CBR. Can I request one? |
| + | How will I know if I have a CBR available? |
| + | Is there a sample CBR that I can view? |

# Helpful Resources

- *CPT® 2021 Professional Edition.* American Medical Association.

- *Special Edition MLN Connects®.* March 31, 2020. CMS. CMS.gov.

- *Special Edition MLN Connects®.* April 3, 2020. CMS. CMS.gov.

# CBR
Comparative Billing Reports

## Welcome to CBR Resources
### This is the official site for information, training and support related to Comparative Billing Reports (CBRs).

CBRs are disseminated to the Medicare provider community to provide insight into Medicare policy and regional billing trends. The CBRs that are distributed to the provider community contain an analysis of billing practices across geographic and service areas. Medicare Administrative Contractors (MACs) have been producing and disseminating comparative billing reports to providers in their jurisdiction as part of their provider education efforts for many years. The Centers for Medicare & Medicaid Services (CMS) has formalized and expanded the program to the national level.

A CBR will present the results of statistical analyses that compare an individual provider's billing practices for a specific billing code or policy group with the billing practices of that provider's peer groups and national averages. Each CBR is unique to a single provider and is only available to that individual provider. CBRs are not publicly available.

| Success stories: How your peers have used CBRs. | Go to Success Stories |

### Upcoming Event: CBR 202009 Critical Care

**When**: Wednesday, November 11, 2020
3:00 – 4:00 p.m. EDT
**Topic**: This session will review the Comparative Billing Report (CBR) 202009 Critical Care

REGISTER

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**CBR 202008:**

**Breast Re-Excision**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 202007:**

**Therapeutic Injections and Infusions**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 202006:**

**Office Visits, New and Established Patients by Nurse**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

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**CBR 202005:**

**Subsequent Nursing Facility E&M Services**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 202004:**

**Peripheral Vascular Intervention for Claudication**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 202003:**

**Lower Extremity Joint Replacement**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

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**CBR 202002:**

**Anesthesia Modifiers**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 202001:**

**Shoulder Arthroscopy**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

**CBR 201913:**

**Mohs Microsurgery**

- Sample CBR: Mock Provider Data (PDF)
- Training: Recording and Handouts
- National/State Data (XLSX)
- Access Your CBR

# Questions?