



# ***CBR202202: Podiatry: Nail Debridement and Evaluation and Management (E&M) Services***



## Webinar Resources



Webinar slides



Webinar recording and handout



Coding guidance document



Webinar Q&A will be posted at  
[CBR.CBRPEPPER.org](https://cbr.cbrpepper.org)



CBR Help Desk:  
<https://cbr.cbrpepper.org/Help-Contact-Us>

# Webinar Objectives

- Understand the purpose and use of Comparative Billing Reports (CBRs).
- Comprehend the function of *CBR202202: Podiatry: Nail Debridement and Evaluation and Management (E&M) Services*.
- Gather resources for further questions and inquiries.

# Webinar Agenda

- What is a CBR?
- How to access your CBR
- Review a sample CBR
- *CBR202202*
- 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

# 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 because your billing patterns differ from your peers' patterns, based on comparisons on a state, specialty, and/or nationwide level.
  - 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.

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**Your Information**

First Name

Last Name

Email

Confirm Email

**Provider Information**

Provider Name

Provider City

Provider State / Territory

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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

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CMS National Provider Identifier (NPI)

Optional: [Search for an NPI at the NPI Registry.](#)

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Validation code

**SUBMIT**

# The Purpose of *CBR202202*

- Protect the Medicare Trust Fund
- Increase providers' awareness about utilization of podiatry services
- Support providers' internal compliance processes
- Provide coding guidelines and requirements

## Podiatry Vulnerability

- According to the *2021 Medicare Fee-for-Service Supplemental Improper Payment Data* report:
  - There is a 10.8% improper payment rate for podiatry, which represents over \$162 million in improper payment.
    - 90% of this improper payment rate is attributed to insufficient documentation.
    - 5.3% of this improper payment rate is attributed to incorrect coding.

# ***CBR202202 Outline***

## **1. Introduction**

- Explanation of CBR focus and billing area vulnerability
- Criteria for receipt of a CBR

## **2. Coverage and Documentation Overview**

- Identification of Current Procedural Terminology® (CPT®) codes
- Summary of provider's utilization

## **3. Metrics**

- List of the metrics and outcomes analyzed with the CBR
- Definition of state and national peer groups

## **4. Methods and Results**

- Overall analysis results
- Individualized results comparing CBR recipients to other providers

## **5. References and Resources**

- Resources used for the CBR

## ***CBR202202 CBR Provider Focus***

- *CBR202202* analyzes the following:
  - Rendering providers with specialty 48 (podiatry) that submitted claims to Medicare Part B for nail debridement services in the office (place of service 11)
  - Submission of claims by providers for CPT® codes for nail debridement services, which includes CPT® codes 11720 and 11721

# Nail Debridement CPT® Codes

CPT® Codes	Description
11720	Debridement of nail(s) by any method(s); 1 to 5
11721	Debridement of nail(s) by any method(s); 6 or more



## E&M CPT® Codes

CPT® Codes	Description
99211	Minimal medical decision making; 5 minutes
99212	Straightforward medical decision making; 10 minutes
99213	Low medical decision making; 15 minutes
99214	Moderate medical decision making; 25 minutes
99215	High medical decision making; 40 minutes

## ***CBR202202 Analysis and Results***

- *CBR202202* summarizes statistics for services with dates of service from Jan. 1, 2019, through Dec. 31, 2019.
- There were 12,997 rendering providers with combined allowed charges of over \$256 million for providers that submitted claims for nail debridement services.

# Nail Debridement Services

## Desired Behavior

- Help reduce the possibility of improper payments by taking the following actions:
  - Review CPT® codes to ensure correct code assignment.
  - Perform regular internal reviews of documentation and code selection to ensure accuracy and compliance.
- Proper use of modifier 25
  - Confirm that a significant, separately identifiable E&M service took place.

## Metrics of *CBR202202*

This report is an analysis of the following metrics:

1. Percentage of nail debridement services billed with E&M services with modifier 25
2. Percentage of nail debridement services billed with CPT® code 11721
3. Average nail debridement services, per beneficiary, per calendar year
4. Average minutes, per visit, of E&M services billed with modifier 25 with nail debridement services

# The Criteria for Receiving *CBR202202*

- The criteria for receiving *CBR202202* are that a provider:
  - Is significantly higher compared to either state or national percentages in any of the four metric calculations (i.e., greater than or equal to the 80th percentile), and
  - Has at least 43 beneficiaries with claims submitted for nail debridement, and
  - Has at least \$3,200 in total allowed charges for nail debridement and E&M services.

## Peer Comparison Outcomes

- **Significantly Higher** — Provider's value is greater than or equal to the 80th percentile from the state or national mean.
- **Higher** — Provider's value is greater than the state or national mean.
- **Does Not Exceed** — Provider's value is less than or equal to the state or national mean.
- **Not Applicable (N/A)** — Provider does not have sufficient data for comparison.

# About the 80<sup>th</sup> Percentile

- Statistics were calculated for each provider in three metrics, as well as for all providers in the nation. Each provider's values were compared to the provider's peer state group's values, as well as the national values.
- Providers receiving a CBR have an outcome of "Significantly Higher" for any of the three metrics.
- These results look very different from the results of providers' peers on a state or national level.



# Calculation of Metric 1

## **Percentage of Nail Debridement Services Billed with E&M Services with Modifier 25**

- Metric 1 is calculated as follows:
  - The number of nail debridement services billed with an E&M service with modifier 25 on the same date of service for the same beneficiary is divided by the total number of nail debridement services.



## Calculation of Metric 2

### **Percentage of Nail Debridement Services Billed with CPT® Code 11721**

- Metric 2 is calculated as follows:
  - The total number of allowed services for CPT® code 11721 is divided by the total number of allowed services for all nail debridement services.

## Calculation of Metric 3

### **Average Nail Debridement Services, per Beneficiary, per Calendar Year**

- Metric 3 is calculated as follows:
  - The total number of allowed nail debridement services is divided by the number of beneficiaries receiving at least one nail debridement service.

# Calculation of Weighted Services

## **Weighted Services are calculated as follows:**

- The time value assigned to each CPT® that corresponds to the time described is multiplied by the allowed services for the E&M CPT® code billed with modifier 25 with nail debridement services.

## Calculation of Metric 4

### **Average Minutes, per Visit, of E&M Services Billed with Modifier 25 with Nail Debridement Services**

- Metric 4 is calculated as follows:
  - The weighted services are divided by the number of dates of service with at least one E&M service with modifier 25 billed on the same date of service as a nail debridement service.

## ***CBR202202 Provider Trend Figure 1***

- Figure 1: Total Number of Beneficiaries Who Had Claims Submitted for Nail Debridement Services
- The years for the graph are defined as follows:
  - Year 1: Jan. 1, 2017 – Dec. 31, 2017
  - Year 2: Jan. 1, 2018 – Dec. 31, 2018
  - Year 3: Jan. 1, 2019 – Dec. 31, 2019

## ***CBR202202 Provider Trend Figure 2***

- Figure 2: Total Number of Claims Submitted for Nail Debridement Services, per Month, for Year 3
- Each month for the analysis year (i.e., 2019) is displayed for both nail debridement services CPT® codes 11720 and 11721.

# 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**



# 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.
- [2021 Medicare Fee-for-Service Supplemental Improper Payment Data](#). U.S. Department of Health and Human Services (HHS). CMS.gov.



### 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](#)

#### 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

#### 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

#### 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?

