

Medicaid Improper Payment Findings

FY 2009 – FY 2011 Payment Error Rate Measurement (PERM) Cycles CMS

FY 2009 - FY 2011

Updated: December 2012

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Background

The data contained in this package is a compilation of Medicaid improper payments identified in Fiscal Years (FYs) 2009, 2010, and 2011 through the Payment Error Rate Measurement (PERM) program. PERM is the Medicaid and Children's Health Insurance Program (CHIP) improper payment measurement required by the Improper Payment Information Act (IPIA) and Improper Payments Elimination and Recovery Act (IPERA). CMS annually estimates the amount of Medicaid improper payments and submits those estimates to Congress.

Through the PERM program, CMS samples state Fee-For-Service (FFS) and managed care Medicaid payments, collects documentation from providers, conducts a data processing review on sampled FFS and managed care payments, and performs a medical record review on sampled FFS claims. If an error is identified during medical or data processing review, states are given the opportunity to request a difference resolution. In addition, states perform eligibility reviews and submit the results of their eligibility reviews to CMS.

The PERM program uses a 17-state three-year rotation for measuring improper payments in Medicaid, so that CMS measures each state once every three years. The data presented in this package consists of findings from the three most recently completed PERM cycles, FY 2009, FY 2010, and FY 2011, and, therefore, contains findings from all 50 states and the District of Columbia.

CMS recovers the federal share of Medicaid payments from states on a claim-by-claim basis from the FFS and managed care overpayments found in error. CMS also works closely with states to review their error rates, determine root causes of errors and develop corrective actions to address the major causes of errors.

Table 1: Medicaid Errors by Component

	Overp	ayments	Underp	ayments	Total Errors		
Component	Number of Payment Errors	Dollar Amount of Errors	Number of Payment Errors	Dollar Amount of Errors	Number of Payment Errors	Dollar Amount of Errors	
FFS Data Processing	190	\$1,359,876	58	\$5,757	248	\$1,365,633	
FFS Medical Review	777	\$2,119,648	26	\$130,871	803	\$2,250,519	
Managed Care	56	\$44,208	35	\$201	91	\$44,408	
Eligibility	1,538	\$618,897	39	\$7,181	1,577	\$626,078	
Total	2,561	\$4,142,629	158	\$144,010	2,719	\$4,286,639	

Table 2: Fee – For – Service (FFS) Medical Review Errors by Error Type

		Paymen	t Errors	Dollars in	n Error
Error Code	Error Type Description	Number	% of Total Number of Errors	Dollars In Error	% of Total Dollars in Error
MR1	No Documentation	121	15.1%	\$354,740	15.8%
MR2	Insufficient Documentation	302	37.6%	\$893,097	39.7%
MR3	Procedure Coding Error	34	4.2%	\$13,239	0.6%
MR4	Diagnosis Coding Error	62	7.7%	\$547,563	24.3%
MR5	Unbundling	0	0.0%	\$0	0.0%
MR6	Number of Unit(s) Error	162	20.2%	\$199,222	8.9%
MR7	Medically Unnecessary	7	0.9%	\$40,580	1.8%
MR8	Policy Violation	84	10.5%	\$183,126	8.1%
MR9	Admin/Other	31	3.9%	\$18,952	0.8%
	Total	803	100%	\$2,250,519	100%

Table 3: Fee – For – Service (FFS) Medical Review Errors by Service Type

	Paymer	nt Errors	Dollars i	n Error
Service Type	Number	% of Total Number of Errors	Dollars In Error	% of Total Dollars in Error
Habilitation and Waiver Programs	170	21.2%	\$543,627	24.2%
Inpatient Hospital	87	10.8%	\$692,993	30.8%
Nursing Facility, Intermediate Care Facilities	84	10.5%	\$350,262	15.6%
Prescribed Drugs	83	10.3%	\$27,688	1.2%
ICF for the Mentally Retarded and Group Homes	63	7.8%	\$367,697	16.3%
Physicians and Other Licensed Practitioner Services	63	7.8%	\$22,047	1.0%
Psychiatric, Mental Health, and Behavioral Health Services	56	7.0%	\$61,286	2.7%
Personal Support Services	55	6.8%	\$52,568	2.3%
Outpatient Hospital Services and Clinics	39	4.9%	\$20,876	0.9%
Hospice Services	37	4.6%	\$44,861	2.0%
Dental and Other Oral Surgery Services	19	2.4%	\$6,334	0.3%
Home Health Services	14	1.7%	\$27,599	1.2%
Laboratory, X-ray and Imaging Services	11	1.4%	\$10,918	0.5%
Therapies, Hearing and Rehabilitation Services	10	1.2%	\$1,225	0.1%
Durable Medical Equipment (DME) and supplies, Prosthetic/Orthopedic devices and Environmental Modifications	8	1.0%	\$20,126	0.9%
Transportation and Accommodations	3	0.4%	\$158	0.0%
Vision: Ophthalmology, Optometry and Optical Services	1	0.1%	\$255	0.0%
Total	803	100%	\$2,250,519	100%

Table 4: Fee – For – Service (FFS) Medical Review Errors by Service Type and Error Type

Error	Error Type		Inpat	ient Hospital		Mental Health Services				
Code		_ ,	Number of Errors Dol		ollars in Error		umber of Errors	Dollars in Error		
MR1	No Documentation	3	3.4%	\$42,828	6.2%	10	17.9%	\$14,993	24.5%	
MR2	Insufficient Documentation	1	1.1%	\$8,233	1.2%	16	28.6%	\$21,792	35.6%	
MR3	Procedure Coding Error	0	0.0%	\$0	0.0%	2	3.6%	\$2,855	4.7%	
MR4	Diagnosis Coding Error	62	71.3%	\$547,563	79.0%	0	0.0%	\$0	0.0%	
MR5	Unbundling	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR6	Number of Unit(s) Error	13	14.9%	\$51,040	7.4%	19	33.9%	\$18,770	30.6%	
MR7	Medically Unnecessary	7	8.0%	\$40,580	5.9%	0	0.0%	\$0	0.0%	
MR8	Policy Violation	0	0.0%	\$0	0.0%	6	10.7%	\$600	1.0%	
MR9	Admin/Other	1	1.1%	\$2,748	0.4%	3	5.4%	\$2,276	3.7%	
	Total	87	100%	\$692,993	100%	56	100%	\$61,286	100%	

Error	Error Type	N	ursing Intern	nediate Care Fa	ncilities	ICF for the Mentally Retarded and Group Homes				
Code		Number of Errors		Dollars in Error		N	umber of Errors	Dollars in Error		
MR1	No Documentation	8	9.5%	\$19,882	5.7%	7	11.1%	\$81,896	22.3%	
MR2	Insufficient Documentation	49	58.3%	\$240,938	68.8%	27	42.9%	\$260,886	71.0%	
MR3	Procedure Coding Error	0	0.0%	\$0	0.0%	17	27.0%	\$7,135	1.9%	
MR4	Diagnosis Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR5	Unbundling	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR6	Number of Unit(s) Error	3	3.6%	\$6,529	1.9%	6	9.5%	\$2,908	0.8%	
MR7	Medically Unnecessary	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR8	Policy Violation	22	26.2%	\$79,514	22.7%	2	3.2%	\$14,510	3.9%	
MR9	Admin/Other	2	2.4%	\$3,399	1.0%	4	6.3%	\$362	0.1%	
	Total	84	100%	\$350,262	100%	63	100%	\$367,697	100%	

Error			Outpa	tient Services		Physician Services				
Code	Error Type	Number of Errors		Dollars in	Error	Number of Errors		Dollars in Error		
MR1	No Documentation	6	15.4%	\$1,226	5.9%	18	28.6%	\$4,396	19.9%	
MR2	Insufficient Documentation	22	56.4%	\$15,999	76.6%	24	38.1%	\$11,860	53.8%	
MR3	Procedure Coding Error	1	2.6%	\$940	4.5%	12	19.0%	\$1,959	8.9%	
MR4	Diagnosis Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR5	Unbundling	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR6	Number of Unit(s) Error	5	12.8%	\$1,918	9.2%	2	3.2%	\$1,508	6.8%	
MR7	Medically Unnecessary	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR8	Policy Violation	3	7.7%	\$401	1.9%	5	7.9%	\$1,562	7.1%	
MR9	Admin/Other	2	5.1%	\$393	1.9%	2	3.2%	\$762	3.5%	
	Total	39	100%	\$20,876	100%	63	100%	\$22,047	100%	

Table 4: Fee – For – Service (FFS) Medical Review Errors by Service Type and Error Type (Continued)

Error			Dent	tal Services		Prescribed Drugs				
Code	Error Type	Number of Errors		Dollars in Error		_ ,	umber of Errors	Dollars in Error		
MR1	No Documentation	2	10.5%	\$184	2.9%	12	14.5%	\$2,350	8.5%	
MR2	Insufficient Documentation	4	21.1%	\$1,388	21.9%	36	43.4%	\$15,205	54.9%	
MR3	Procedure Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR4	Diagnosis Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR5	Unbundling	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR6	Number of Unit(s) Error	4	21.1%	\$3,049	48.1%	12	14.5%	\$2,979	10.8%	
MR7	Medically Unnecessary	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR8	Policy Violation	4	21.1%	\$293	4.6%	20	24.1%	\$6,687	24.2%	
MR9	Admin/Other	5	26.3%	\$1,420	22.4%	3	3.6%	\$467	1.7%	
	Total	19	100%	\$6,334	100%	83	100%	\$27,688	100%	

Error			Personal S	Support Servic	ees	Hospice Services				
Code	Error Type	Number of Errors		Dollars in	Error		umber of Errors	Dollars in Error		
MR1	No Documentation	13	23.6%	\$8,070	15.4%	5	13.5%	\$16,021	35.7%	
MR2	Insufficient Documentation	22	40.0%	\$13,255	25.2%	13	35.1%	\$8,437	18.8%	
MR3	Procedure Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR4	Diagnosis Coding Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR5	Unbundling	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR6	Number of Unit(s) Error	8	14.5%	\$3,861	7.3%	18	48.6%	\$20,083	44.8%	
MR7	Medically Unnecessary	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
MR8	Policy Violation	10	18.2%	\$26,161	49.8%	0	0.0%	\$0	0.0%	
MR9	Admin/Other	2	3.6%	\$1,221	2.3%	1	2.7%	\$321	0.7%	
	Total	55	100%	\$52,568	100%	37	100%	\$44,861	100%	

Error Code	Europe Tymo	Habilitation and Waiver Programs								
Error Code	Error Type	Number	of Errors	Dollars in Error						
MR1	No Documentation	29	17.1%	\$161,198	29.7%					
MR2	Insufficient Documentation	72	42.4%	\$292,789	53.9%					
MR3	Procedure Coding Error	0	0.0%	\$0	0.0%					
MR4	Diagnosis Coding Error	0	0.0%	\$0	0.0%					
MR5	Unbundling	0	0.0%	\$0	0.0%					
MR6	Number of Unit(s) Error	59	34.7%	\$59,365	10.9%					
MR7	Medically Unnecessary	0	0.0%	\$0	0.0%					
MR8	Policy Violation	7	4.1%	\$27,279	5.0%					
MR9	Admin/Other	3	1.8%	\$2,996	0.6%					
	Total	170	100%	\$543,627	100%					

Table 5: Fee – For – Service (FFS) Data Processing Review Errors by Error Type

		Number	Of Errors	Dollars I	n Error
Error Code	Error Type	Number of Payment Errors	% of Total Number of Errors	Dollars in Error	% of Total Dollars in Error
DP1	Duplicate Item	12	4.8%	\$15,185	1.1%
DP2	Non-covered Service	46	18.5%	\$31,687	2.3%
DP3	FFS Claim for Managed Care Service	9	3.6%	\$101,660	7.4%
DP4	Third-party Liability	13	5.2%	\$45,884	3.4%
DP5	Pricing Error	120	48.4%	\$905,225	66.3%
DP6	Logic Edit	20	8.1%	\$182,551	13.4%
DP7	Data Entry Error	2	0.8%	\$439	0.0%
DP8	Rate Cell Error	0	0.0%	\$0	0.0%
DP9	Managed Care Payment Error	1	0.4%	\$0	0.0%
DP10	Admin/Other	23	9.3%	\$57,484	4.2%
	Total	248	100%	\$1,365,633	100%

Table 6: Fee – For – Service (FFS) Data Processing Review Errors by Service
Type and Error Type

Error	Error Type		Inpatient	Hospital		Mental Health Services				
Code	Error Type	Number	r of Errors	Dollars in	Error	Number of Errors		Dollars in Error		
DP1	Duplicate Item	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP2	Non-covered Service	0	0.0%	\$0	0.0%	7	36.8%	\$5,298	36.9%	
DP3	FFS Claim for Managed Care Service	6	12.8%	\$99,192	44.2%	0	0.0%	\$0	0.0%	
DP4	Third-party Liability	1	2.1%	\$21,113	9.4%	1	5.3%	\$1,564	10.9%	
DP5	Pricing Error	32	68.1%	\$13,094	5.8%	6	31.6%	\$2,445	17.0%	
DP6	Logic Edit	1	2.1%	\$27,480	12.3%	4	21.1%	\$5,016	34.9%	
DP7	Data Entry Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP8	Rate Cell Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP9	Managed Care Payment Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP10	Admin/Other	5	10.6%	\$37,791	16.9%	1	5.3%	\$45	0.3%	
	Total	47	100%	\$224,189	100%	19	100%	\$14,368	100%	

Table 6: Fee – For – Service (FFS) Data Processing Review Errors by Service
Type and Error Type (Continued)

Error	Error Type	Nursing	Intermedia	ite Care Fa	acilities	ICF for the Mentally Retarded a Group Homes			
Code	3	Number	of Errors	Dollars in Error		Number of Errors		Dollars in Error	
DP1	Duplicate Item	1	5.6%	\$4,304	16.1%	0	0.0%	\$0	0.0%
DP2	Non-covered Service	1	5.6%	\$6,733	25.2%	2	22.2%	\$446	0.3%
DP3	FFS Claim for Managed Care Service	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP4	Third-party Liability	0	0.0%	\$0	0.0%	1	11.1%	\$414	0.3%
DP5	Pricing Error	14	77.8%	\$8,720	32.7%	4	44.4%	\$612	0.4%
DP6	Logic Edit	2	11.1%	\$6,928	26.0%	1	11.1%	\$141,240	98.9%
DP7	Data Entry Error	0	0.0%	\$0	0.0%	1	11.1%	\$81	0.1%
DP8	Rate Cell Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP9	Managed Care Payment Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP10	Admin/Other	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
	Total	18	100%	\$26,684	100%	9	100%	\$142,793	100%

Error	Error Type		Outpatient Services				Physician Services			
Code	Error Type	Number of Errors Dollars in Error		Number	of Errors	Dollars in Error				
DP1	Duplicate Item	1	5.6%	\$58	0.2%	0	0.0%	\$0	0.0%	
DP2	Non-covered Service	1	5.6%	\$308	1.3%	1	5.9%	\$125	2.8%	
DP3	FFS Claim for Managed Care Service	1	5.6%	\$2,019	8.5%	0	0.0%	\$0	0.0%	
DP4	Third-party Liability	2	11.1%	\$2,828	11.9%	3	17.6%	\$2,666	58.9%	
DP5	Pricing Error	9	50.0%	\$3,781	16.0%	8	47.1%	\$73	1.6%	
DP6	Logic Edit	2	11.1%	\$187	0.8%	0	0.0%	\$0	0.0%	
DP7	Data Entry Error	1	5.6%	\$359	1.5%	0	0.0%	\$0	0.0%	
DP8	Rate Cell Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP9	Managed Care Payment Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP10	Admin/Other	1	5.6%	\$14,151	59.7%	5	29.4%	\$1,664	36.7%	
	Total	18	100%	\$23,691	100%	17	100%	\$4,528	100%	

Error			Prescribe	d Drugs			port Serv	Services	
Code	Error Type	Number of Errors		Dollars in Error		Number of Errors		Dollars in Error	
DP1	Duplicate Item	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP2	Non-covered Service	3	14.3%	\$1,316	36.2%	1	12.5%	\$98	16.2%
DP3	FFS Claim for Managed Care Service	1	4.8%	\$115	3.2%	0	0.0%	\$0	0.0%
DP4	Third-party Liability	2	9.5%	\$809	22.3%	0	0.0%	\$0	0.0%
DP5	Pricing Error	15	71.4%	\$1,395	38.4%	3	37.5%	\$50	8.3%
DP6	Logic Edit	0	0.0%	\$0	0.0%	4	50.0%	\$457	75.5%
DP7	Data Entry Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP8	Rate Cell Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP9	Managed Care Payment Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
DP10	Admin/Other	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%
	Total	21	100%	\$3,635	100%	8	100%	\$605	100%

Table 6: Fee – For – Service (FFS) Data Processing Review Errors by Service
Type and Error Type (Continued)

Error	or Emon Tune		Hospice Services				Habilitation and Waiver Programs			
Code	Error Type	Number of Errors		Dollars i	n Error	Number of Errors		Dollars in Error		
DP1	Duplicate Item	5	33.3%	\$10,271	77.7%	5	17.9%	\$553	2.9%	
DP2	Non-covered Service	0	0.0%	\$0	0.0%	15	53.6%	\$15,695	81.7%	
DP3	FFS Claim for Managed Care Service	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP4	Third-party Liability	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP5	Pricing Error	10	66.7%	\$2,954	22.3%	4	14.3%	\$1,649	8.6%	
DP6	Logic Edit	0	0.0%	\$0	0.0%	3	10.7%	\$813	4.2%	
DP7	Data Entry Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP8	Rate Cell Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP9	Managed Care Payment Error	0	0.0%	\$0	0.0%	0	0.0%	\$0	0.0%	
DP10	Admin/Other	0	0.0%	\$0	0.0%	1	3.6%	\$495	2.6%	
	Total	15	100%	\$13,225	100%	28	100%	\$19,205	100%	

Ewyon Codo	Error Code Error Type		pitated Care	Fixed Paym	ents
Error Code	Error Type	Number	of Errors	Dollars in Error	
DP1	Duplicate Item	0	0.0%	\$0	0.0%
DP2	Non-covered Service	10	55.6%	\$1,221	0.1%
DP3	FFS Claim for Managed Care Service	0	0.0%	\$0	0.0%
DP4	Third-party Liability	0	0.0%	\$0	0.0%
DP5	Pricing Error	1	5.6%	\$862,874	99.7%
DP6	Logic Edit	0	0.0%	\$0	0.0%
DP7	Data Entry Error	0	0.0%	\$0	0.0%
DP8	Rate Cell Error	0	0.0%	\$0	0.0%
DP9	Managed Care Payment Error	1	5.6%	\$0	0.0%
DP10	Admin/Other	6	33.3%	\$1,423	0.2%
	Total	18	100%	\$865,517	100%

Table 7: Managed Care Data Processing Review Errors by Error Type

Error	Error		Managed Care					
Code	Error Type	Number	of Errors	Dollars in Error				
DP1	Duplicate Item	6	6.6%	\$11,855	26.7%			
DP2	Non-covered Service	40	44.0%	\$22,107	49.8%			
DP3	FFS Claim for Managed Care Service	0	0.0%	\$0	0.0%			
DP4	Third-party Liability	0	0.0%	\$0	0.0%			
DP5	Pricing Error	6	6.6%	\$173	0.4%			
DP6	Logic Edit	1	1.1%	\$9,053	20.4%			
DP7	Data Entry Error	0	0.0%	\$0	0.0%			
DP8	Rate Cell Error	1	1.1%	\$28	0.1%			
DP9	Managed Care Payment Error	33	36.3%	\$5	0.0%			
DP10	Admin/Other	1	1.1%	\$31	0.1%			
	Total	91	100%	\$44,408	100%			

Table 8: Eligibility Payment Errors by Error Type

		Total	Over	payments	Underp	ayments	Percentage of Total Errors	
Error Code	Error Type	Number of Errors	Number of Errors	Dollars in Error	Number of Errors	Dollars in Error	% of Total Number of Errors	% of Total Dollars in Error
NE	Not Eligible	706	706	\$293,663	0	\$0	44.8%	46.9%
U	Undetermined	614	614	\$272,091	0	\$0	38.9%	43.5%
L/U	Liability Understated	141	141	\$20,393	0	\$0	8.9%	3.3%
EI	Eligible with Ineligible Services	70	70	\$32,626	0	\$0	4.4%	5.2%
L/O	Liability Overstated	39	0	\$0	39	\$7,181	2.5%	1.1%
MCE2	Managed Care Error, Eligible for Managed Care but Improperly Enrolled	4	4	\$66	0	\$0	0.3%	0.0%
MCE1	Managed Care Error, Ineligible for Managed Care	3	3	\$57	0	\$0	0.2%	0.0%
	Total	1,577	1,538	\$618,897	39	\$7,181	100%	100%

Table 9: Eligibility Negative Case Errors by Error Type

Stratum	Number of Cases	Percentage of All Cases	Percentage of Cases in Error
Correct	9,945	95.0%	
Improper Termination	373	3.6%	72.1%
Improper Denial	144	1.4%	27.9%
Total Negative Cases	10,463	100%	100%