

PHP Improper Payment Risks

- PEPPER does not identify improper payments.
- PHPs are reimbursed on a per-diem basis through the Outpatient Prospective Payment System (OPPS).
- PHPs can be at risk for improper Medicare payments.
- Target areas were identified based on review of the PHP reimbursement methodology, analysis of claims data and coordination with CMS subject matter experts.

Office of Inspector General Report

- “Questionable Billing by Community Mental Health Centers”, August 2012, OEI-04-11-00100
- Identified nine questionable billing characteristics for CMHC PHP services
- Available at <http://oig.hhs.gov/oei/reports/oei-04-11-00100.pdf>

Target Area

- Area identified as potentially at risk for improper Medicare payments.
- Constructed as a ratio:
 - Numerator = episodes of care identified as potentially problematic
 - Denominator = larger reference group that contains the numerator

PHP PEPPER Target Areas

Target Area	Target Area Definition
Group Therapy	<i>Numerator (N)</i> : count of EOC ending in the report period with only group therapy (HCPCS codes G0410 or G0411) billed <i>Denominator (D)</i> : count of all EOC ending in the report period
No Individual Psychotherapy	<i>N</i> : count of EOC ending in the report period with no units of individual psychotherapy (HCPCS codes 90785, 90832, 90833, 90834, 90836, 90837, 90838, 90845, 90865, or 90880) <i>D</i> : count of all EOC ending in the report period

PHP PEPPER Target Areas (cont.)

Target Area	Target Area Definition
60+ Days of Service	<i>N</i> : count of EOC ending in the report period with greater than or equal to 60 days of service provided by the PHP <i>D</i> : count of all EOC ending in the report period
30-Day Readmissions	<i>N</i> : count of all index (first) EOC ending in the report period for which a resumption of care occurred within 30 days to the same or to another PHP <i>D</i> : count of all EOC ending in the report period