



Fraud, Waste and Abuse (FWA) Code Gaming

**Chief Business Office Purchased Care
Department of Program Integrity (DPI)
June 2013**



Benefits of This Training



- **Assist providers in learning appropriate billing and coding practices**
- **Appropriate billing for medical services**
- **Minimize flagged claims for review by Program Integrity**



Objectives

- **Define Code Gaming**
- **Identify Results**
- **Interpret Examples**
- **Raise Awareness**





Code Gaming



“Code Gaming involves the manipulation of CPT or other codes used by providers in order to get higher reimbursement for medical procedures than would be paid otherwise.”



Results

- **Increases Reimbursement**
- **A Form of Improper Billing**
- **Misrepresents Services Rendered**
- **Could be Fraudulent or Abusive**





Proper Billing Example



42 REV. CD.	43 DESCRIPTION	44 HCPCS/RATES/HPPS CODE	45 SERV. DATE	46 SERV. UNITS	47 TOTAL CHARGES	48 NON-COVERED CHARGES	49
421	PHYSICAL THERAPY VISIT	G0151	09082010	1	128.63		
551	SKILLED NURSING VISIT	G0154	09082010	1	128.63		
551	SKILLED NURSING VISIT	G0154	09102010	1	128.63		
PAGE 1		CREATION DATE	10282010	TOTALS ⇨	385.89		
50 PAYER NAME CHAMPVA		51 HEALTH PLAN ID	52 REL INFO Y	53 ASG BEN Y	54 PRIOR PAYMENTS	55 EST. AMOUNT DUE 385.89	56 NPI 57 OTHER PRVID
58 INSURED'S NAME Bea A. Patient		59 P. REL 18	60 INSURED'S UNIQUE ID 111223344		61 GROUP NAME	62 INSURANCE GROUP NO.	
63 TREATMENT AUTHORIZATION CODES		64 DOCUMENT CONTROL NUMBER		65 EMPLOYER NAME			
66 DX	493.20	780.79	250.00	135	427.31	V58.61	V58.67
						V5865	V462
69 ADMIT DX	799.1	70 PATIENT REASON DX	71 PPS CODE	72 ECI			73



Improper Claim Example

42 REV. CD.	43 DESCRIPTION	44 HCPCS/RATES/HPPS CODE	45 SERV. DATE	46 SERV. UNITS	47 TOTAL CHARGES	48 NON-COVERED CHARGES	49
421	PHYSICAL THERAPY VISIT	S9131	09082010	4	210.00		
551	SKILLED NURSING VISIT	G0154	09082010	4	183.75		
551	SKILLED NURSING VISIT	G0154	09102010	4	183.75		
PAGE 1		CREATION DATE		10282010	TOTALS	577.50	
50 PAYER NAME CHAMPVA		51 HEALTHPLANID	52 REL INFO Y	53 ASG BEN Y	54 PRIOR PAYMENTS	55 EST. AMOUNT DUE 577.50	56 NPI 57
58 INSURED'S NAME Bea A. Patient		59 P. REL 18	60 INSURED'S UNIQUE ID 111223344		61 GROUP NAME	62 INSURANCE GROUP NO.	
63 TREATMENT AUTHORIZATION CODES			64 DOCUMENT CONTROL NUMBER		65 EMPLOYER NAME		
66 DR							68
69 ADMIT DR 799.1	70 PATIENT REASON DX	71 PPS CODE	72 ECI				73
74	PRINCIPAL PROCEDURE		OTHER PROCEDURE	75		4031507000	



Identification & Awareness



- **Detailed Review**
- **Data Collections**
- **Training**
- **Reporting**





Conclusion



- **Defined Code Gaming**
- **Identified Results**
- **Interpreted Examples**
- **Raised Awareness**



References

Veterans Affairs manages several health care programs that reimburse private health care providers for caring for our Veterans and their eligible family members. Unfortunately, these health care programs have a different statutory and regulatory authority, which creates diverse payment methodologies. The majority of VA health care programs utilize Medicare's payment methodologies or something very similar.

Therefore, providers and facilities that utilize Medicare's billing and coding guidelines will greatly minimize claim delays or rejections as a result of the Program Integrity Tools' Improper Payment Review.

The following Medicare link is an excellent source of billing and coding guidance for all providers and facilities:

<http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/clm104c01.pdf>