

DOCUMENTATION BEST PRACTICES

Confident Compliance

The image shows a hand holding a tablet displaying the InsightGO medical documentation interface. The screen is divided into a sidebar menu on the left and a main form area on the right. The sidebar menu includes sections for Demographics, Appointments, Attachments, Active Cases, Insurance, Goals, Chart Notes, and Current Note. The main form area displays a patient profile for Joe Smith, with a sidebar menu on the left and a main form area on the right. The form includes sections for Subjective, Onset, Referral, Pain, and General Health Questions, with various checkboxes and text input fields.

InsightGO Hello tlevene.emr

Max Eisenhardt (91)

Joe Smith

Demographics
Appointments 18
Attachments

Active Cases + ADD

Knee Pain 5

Insurance
Goals

Chart Notes 3

Current Note
Standard Visit
11/01/2019

Last Note
Standard Visit
05/20/2019

First Note
Initial Eval
07/19/2018

Shoulder Pain 0

Insurance
Goals 3

Chart Notes 2

Current Note
Standard Visit
01/10/2020

Last Note

Subjective
Summary
Enter summary text here

Include all displayed items from this area

Onset

☒ Date of Onset Approximately 1 week ago

☒ Onset Due To At home injury

☒ Onset Speed Gradual

☒ Recent Symptom Trend Condition improving

☒ Mechanism of Shoulder Injury Anterior blunt trauma

Referral

☒ Reason for Pediatric Therapy Referral clinger

Pain

☒ Location of Shoulder Pain Frequent pain in entirety of shoulder

☒ Location of Arm and Elbow Pain Generalized L. elbow pain. Not well localized.

☒ Pain Frequency Constant

☒ Pain Radiation Pain radiates no further than proximal 1/3 of extremity

Pain Rating

☒ Verbal Pain Rating at Present 9 - Severe Pain Notes

General Health Questions

☒ Personal Health Rating: "At the present time, would you say that your health is excellent, very good, fair, or poor?" Excellent

☒ Other Health Problems Allergies

☒ Pre-existing Conditions Patient denies any other pertinent medical problems.

☒ Dominant Hand Left

☒ Current Medications Analgesics

HOST



Marianne Braunstein

Vice President of Product
Clinicient, Inc.

Marianne Braunstein is responsible for driving the product vision, strategy and roadmap as well as leading the product team and overseeing the product development process at Clinicient. Marianne is a veteran in the healthcare IT space and brings to Clinicient 20 years of experience in senior product roles and a proven track record of developing solid business plans that deliver products and services based on market need and opportunity.

Prior to Clinicient, Marianne served as the VP of Product at Epocrates, athenahealth and WebMD Health Services. She has also held senior product management roles at MedicaLogic (now Centricity) and GE Healthcare. Marianne holds the belief that employees, clients and users are the most critical asset for any company and encourages a culture based on mutual respect and trust that drives smart innovation and urgency.

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PRESENTER



Jerry Henderson, PT

Founder and Vice President of Clinical Strategy
Clinicient, Inc.

Jerry is the founder of Clinicient, and serves as “the voice of the therapist” in all company undertakings. He has deep roots in physical therapy, and brings an immense amount of industry thought leadership to the company’s therapist-facing activities.

Prior to Clinicient, he started three successful private practices and one of the first physical therapy specific EMRs. He has had extensive clinical experience in a variety of settings. He speaks regularly at industry conferences, and is published frequently in professional journals.

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🐦 [@HendersonPDX](https://twitter.com/HendersonPDX)

WHAT'S ON THE AGENDA

Analyze Most Important and Common Documentation Errors

Name the Four Most Important Documentation Practices

Ensure Complete, Compliant, and Efficient Documentation

InsightGO

Max Eisenhardt (91)

Joe Smith

Demographics

Appointments 18

Attachments

Active Cases + ADD

Knee Pain 5

Insurance

Goals

Chart Notes 3

Current Note
Standard Visit
11/01/2019

Last Note
Standard Visit
05/20/2019

First Note
Initial Eval
07/19/2018

Shoulder Pain 0

Insurance

Goals 3

Chart Notes 2

Current Note
Standard Visit
01/10/2020

Last Note

Subjective

Summary

Enter summary text here

Include all displayed items from this area

Onset

Date of Onset: Approximately 1 week ago.

Onset Due To: At home injury.

Onset Speed: Gradual.

Recent Symptom Trend: Condition improving.

Mechanism of Shoulder Injury: Anterior blunt trauma.

Referral

Reason for Pediatric Therapy Referral: Wound.

Pain

Location of Shoulder Pain: Frequent pain in entirety of shoulder.

Location of Arm and Elbow Pain: Generalized L elbow pain, not well localized.

Pain Frequency: Constant.

Pain Radiation: Pain radiates no further than proximal 1/3 of arm/leg.

Pain Rating

Verbal Pain Rating at Present: 3 - Severe Pain - None

General Health Questions

Personal Health Rating: "At the present time, would you say that your health is excellent, very good, fair, or poor?" Excellent.

Other Health Problems: Allergies.

Pre-existing Conditions: Patient denies any other pertinent medical problems.

Dominant Hand: Left.

Current Medications: Analgesics.

Diagnostic Tests

SOME HOUSEKEEPING

Using GoToWebinar®

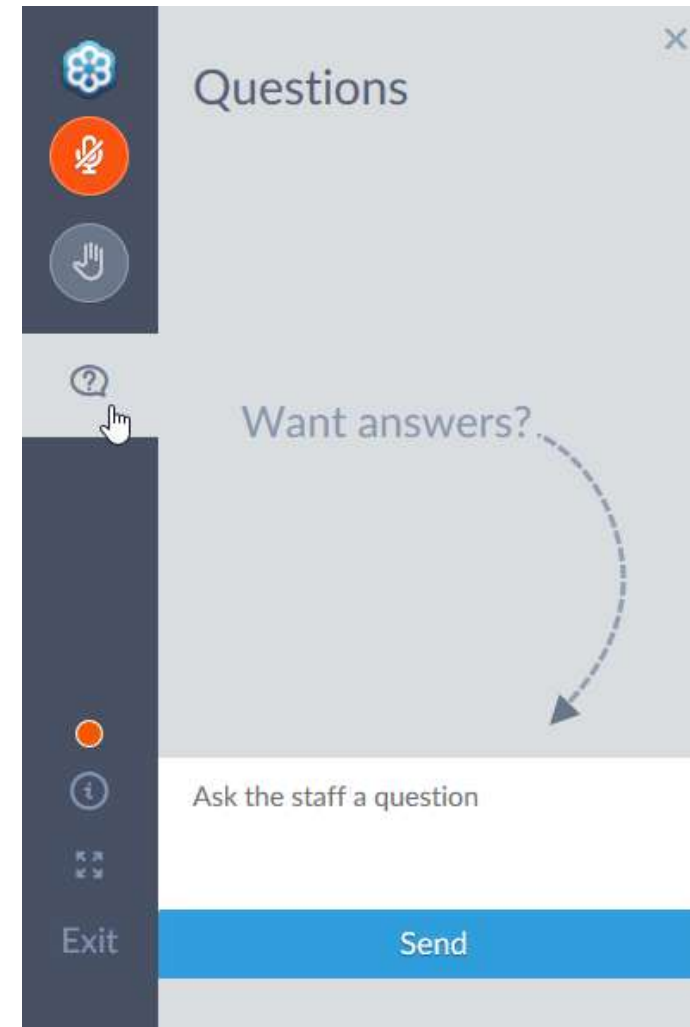
Click on orange arrow to show or hide panel

This Session will be recorded

- Link to the recording and resources will be emailed to all registrants

Please use the “Questions” Panel

- Please do not use the “raise hand”
- Questions will be answered at the end of the webinar as time allows
- Additional questions will be answered in emailed resources



SOME FINE PRINT

The information provided herein is intended to be general in nature. It is not offered as legal or insurance related advice, and is not a complete description, or meant, or intended, to replace or be interpreted as specific, of Medicare requirements. Although every effort has been made to ensure the content herein is correct, we assume no responsibility for its accuracy. Contact Department of Health & Human Services (DHHS) Centers for Medicare and Medicaid Services (CMS) for more information.

COMPREHENSIVE ERROR RATE TESTING - 2019



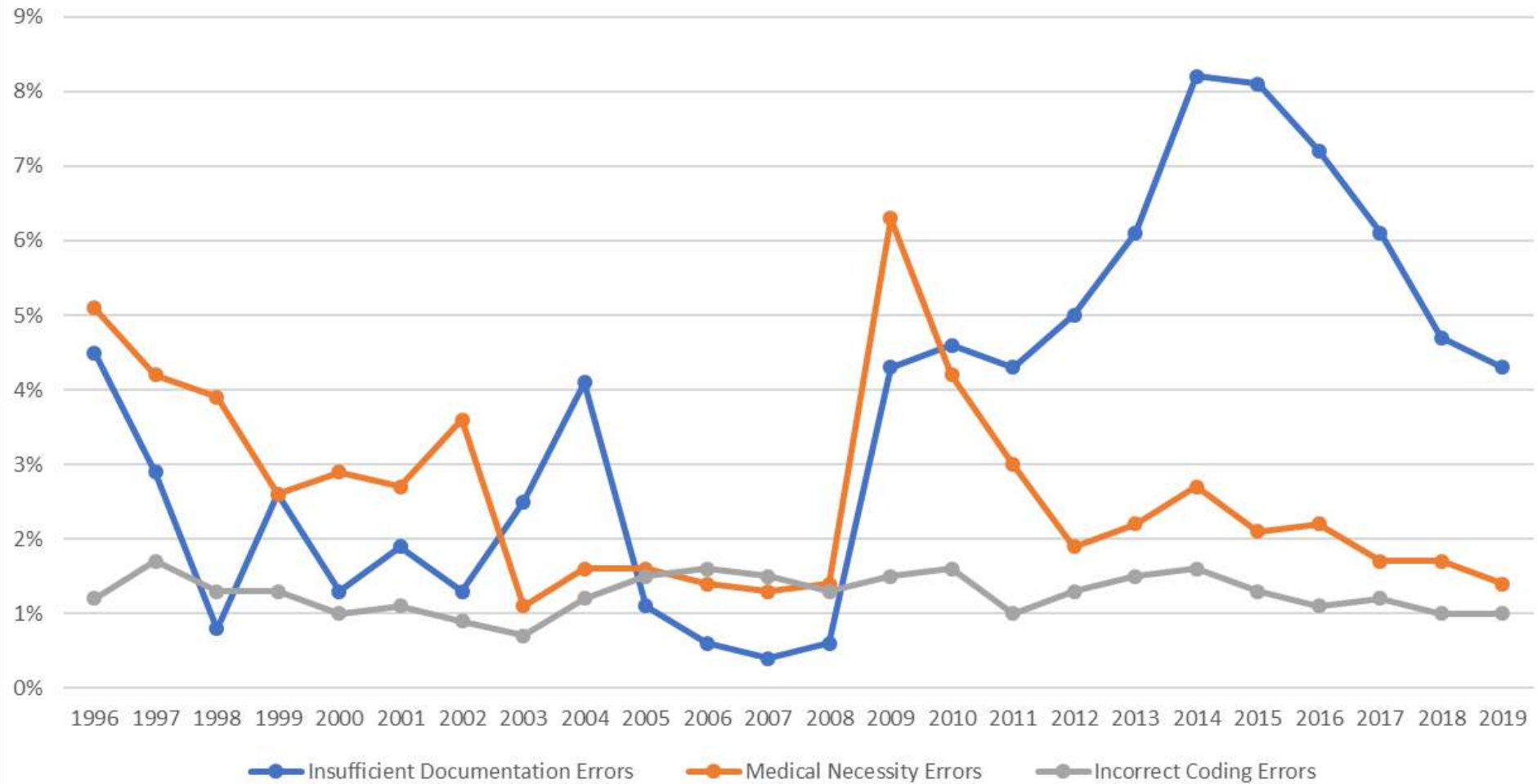
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES

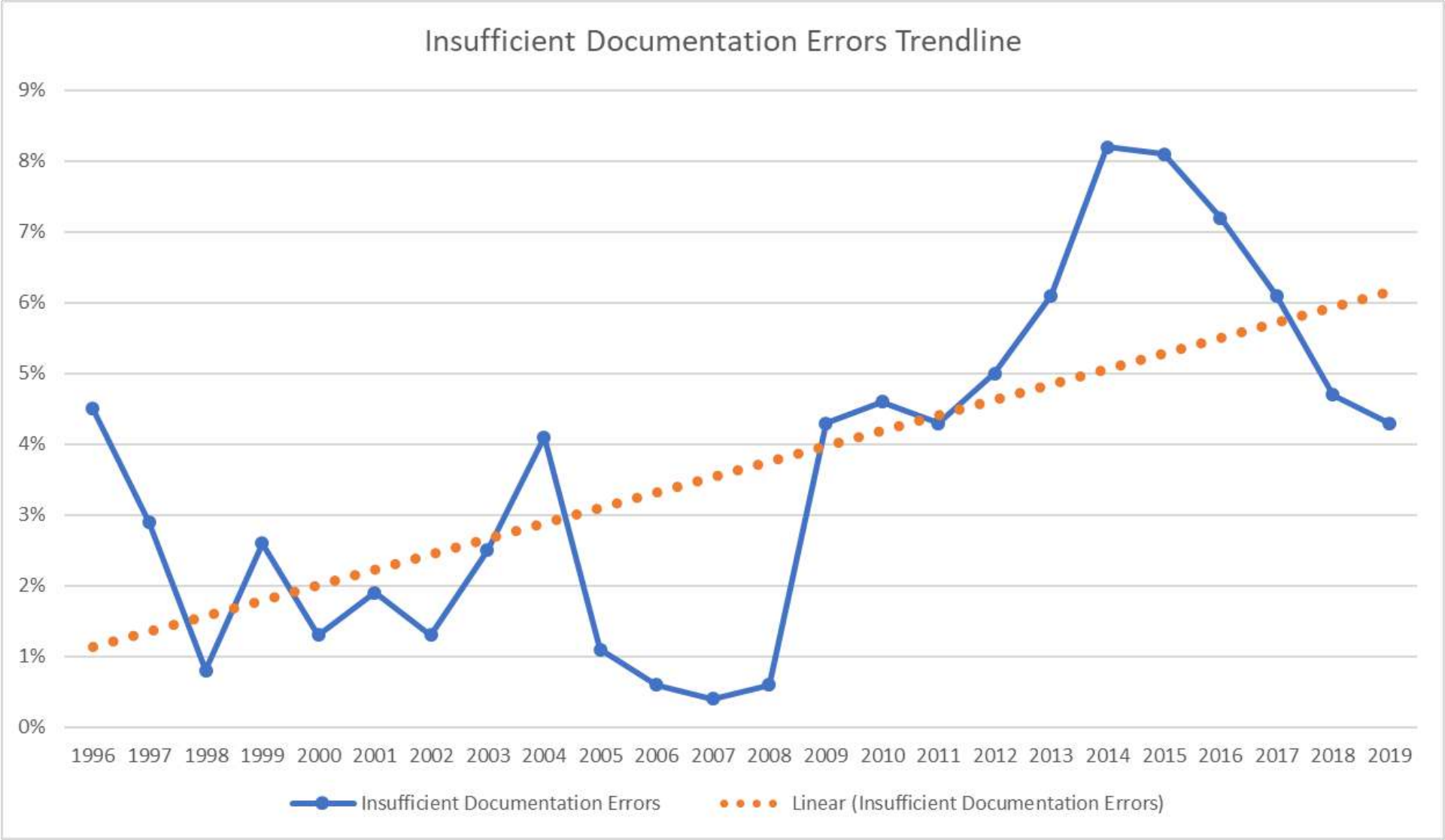
2019 Medicare Fee-for-Service Supplemental Improper Payment Data

- Overpayment Data
- Root Cause Analysis
- Practice Setting Comparison
- Error Rate Trends

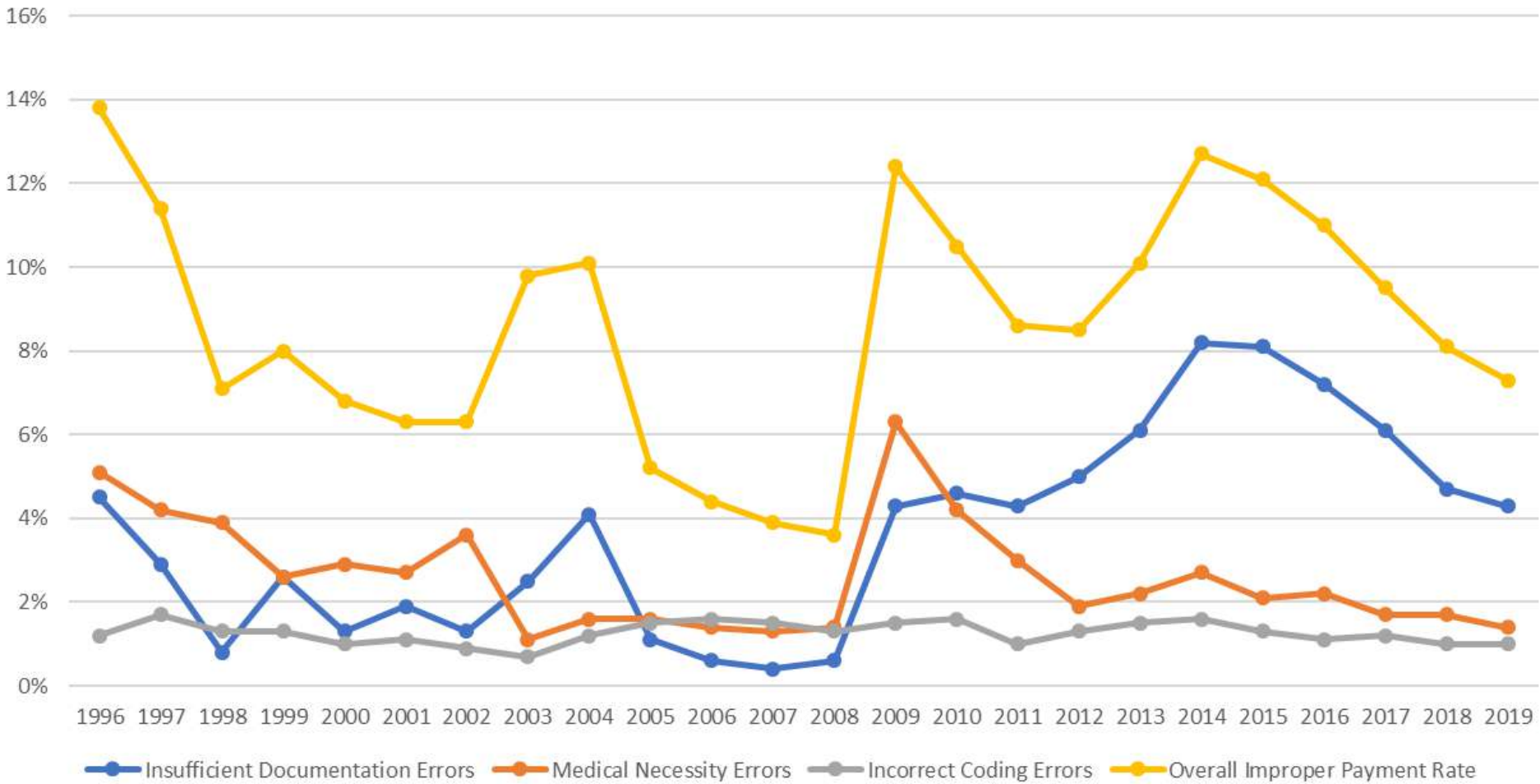
[Medicare Supplemental Improper Payment Data 2019](#)

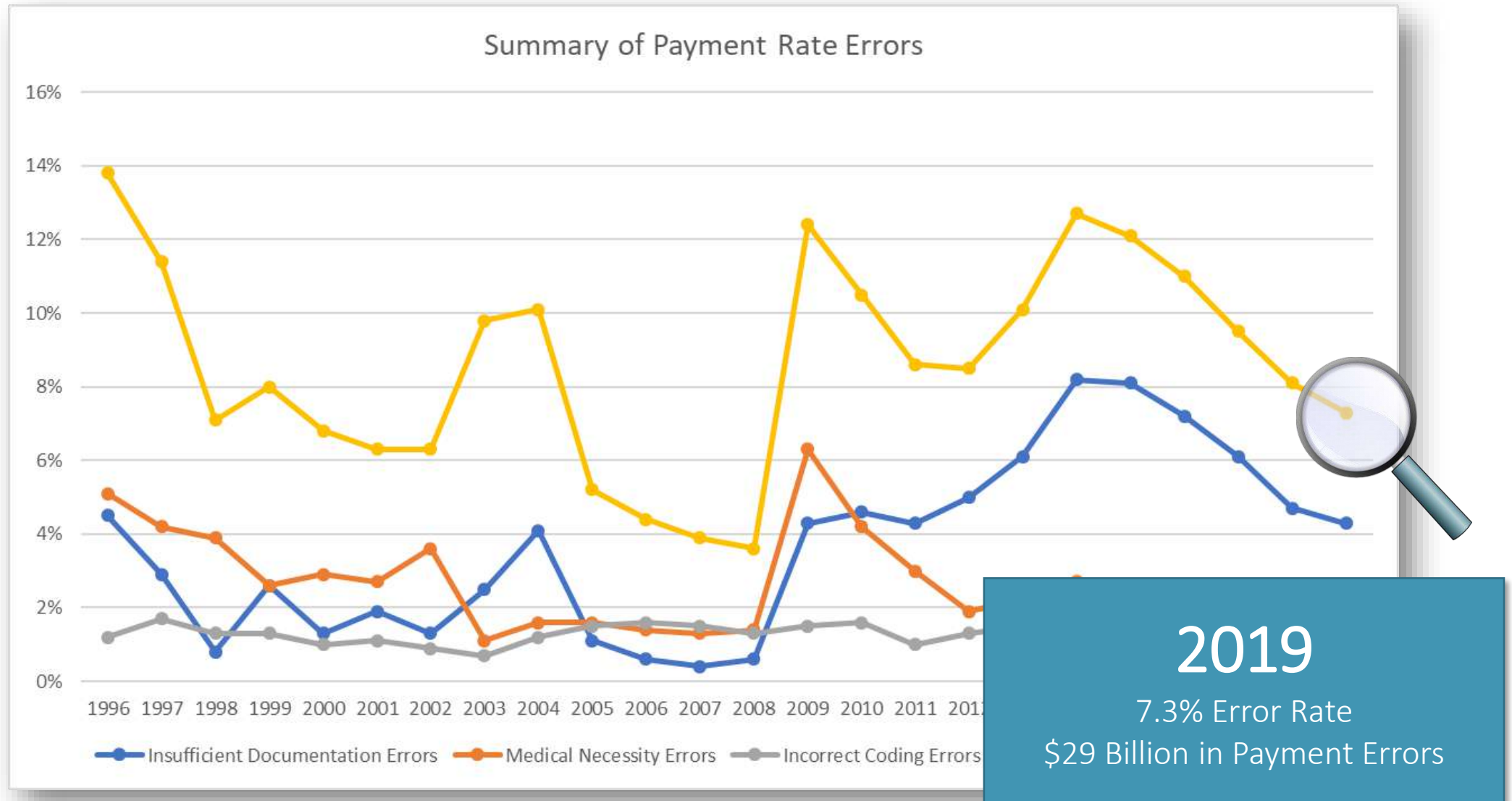
Summary of Payment Rate Errors



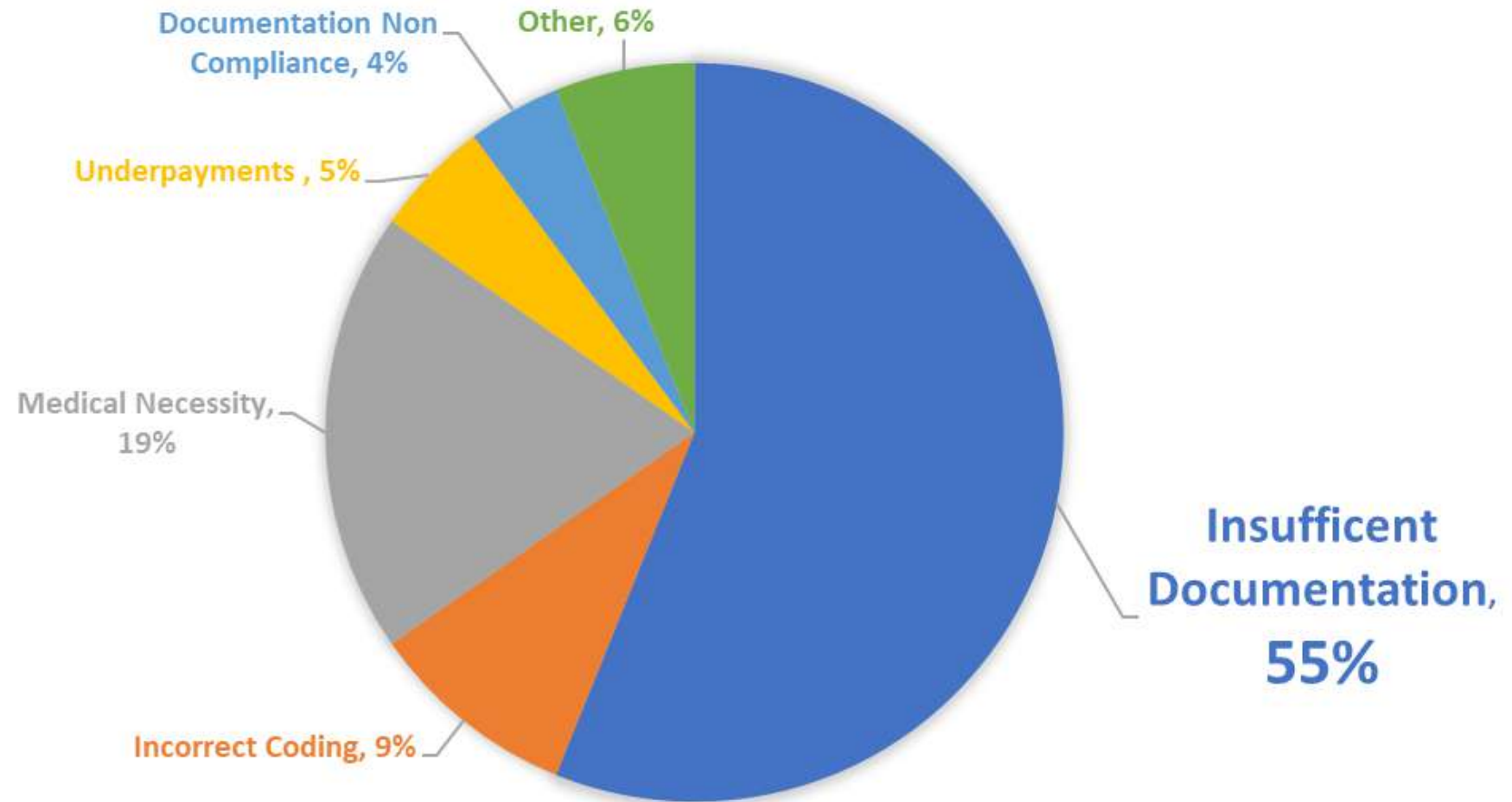


Summary of Payment Rate Errors





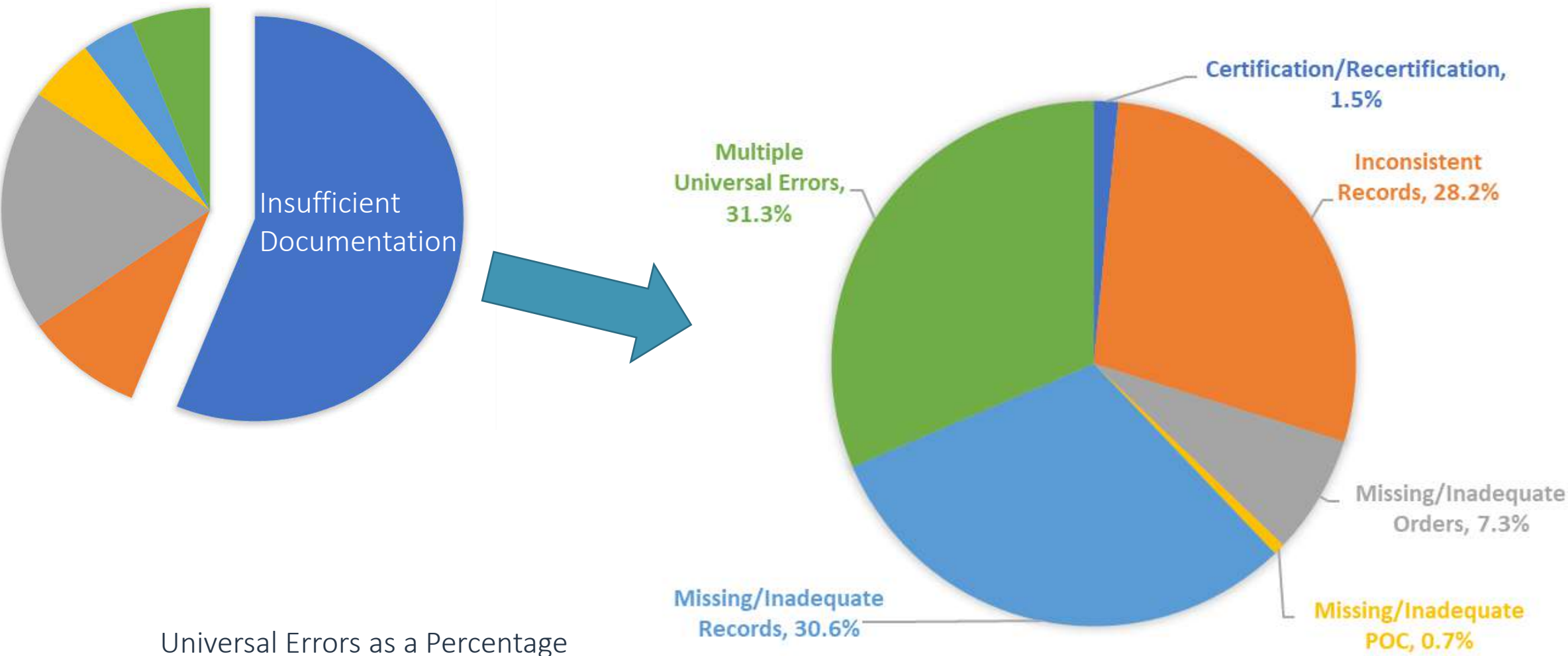
TOP CAUSES OF IMPROPER PAYMENTS – ALL PROVIDERS



Medicare Supplemental Improper Payment Data 2019

Page 10

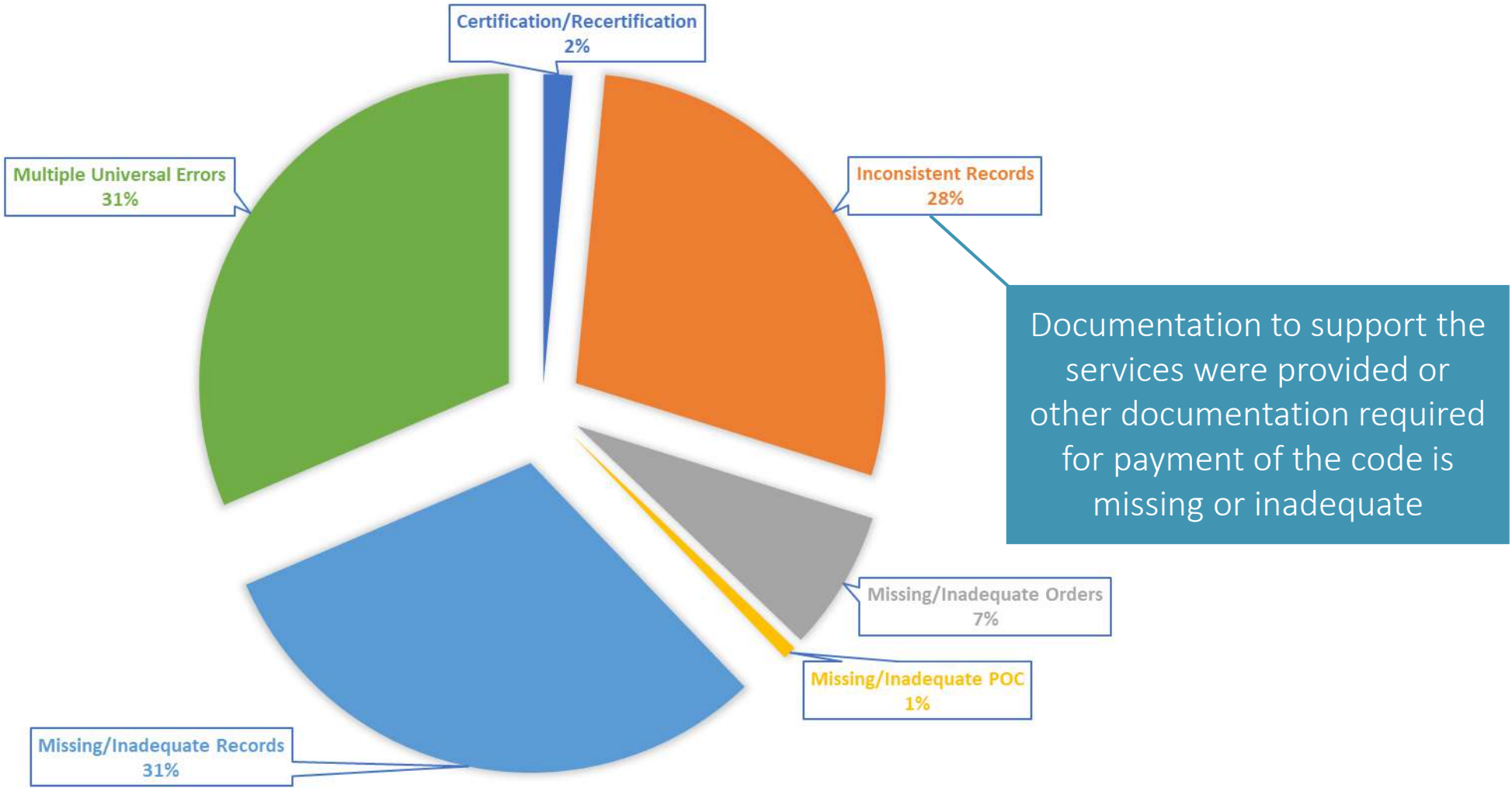
ROOT CAUSES OF INSUFFICIENT DOCUMENTATION



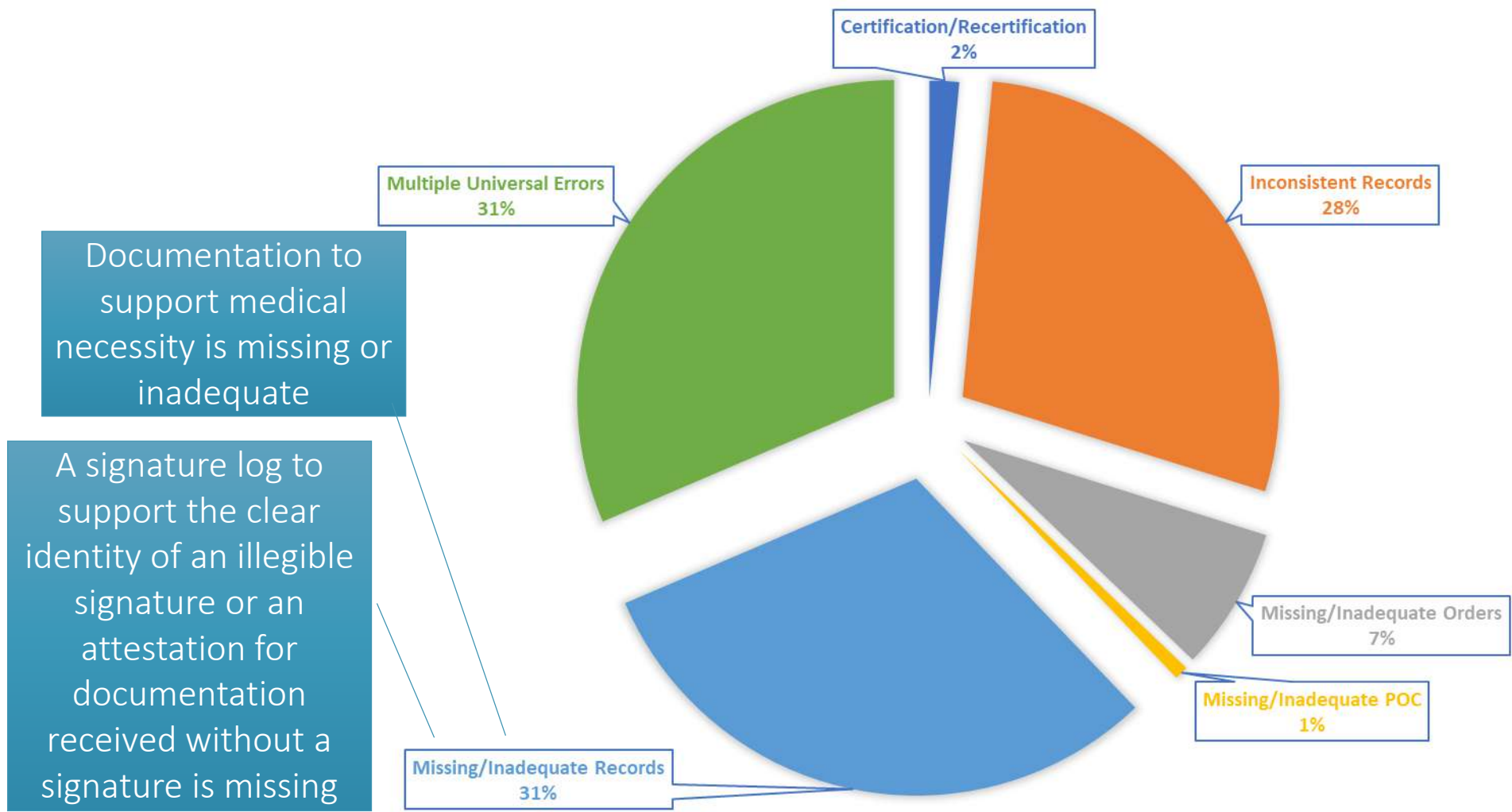
Universal Errors as a Percentage of Part B Improper Payments Due to Insufficient Documentation

Medicare Supplemental Improper Payment Data 2019

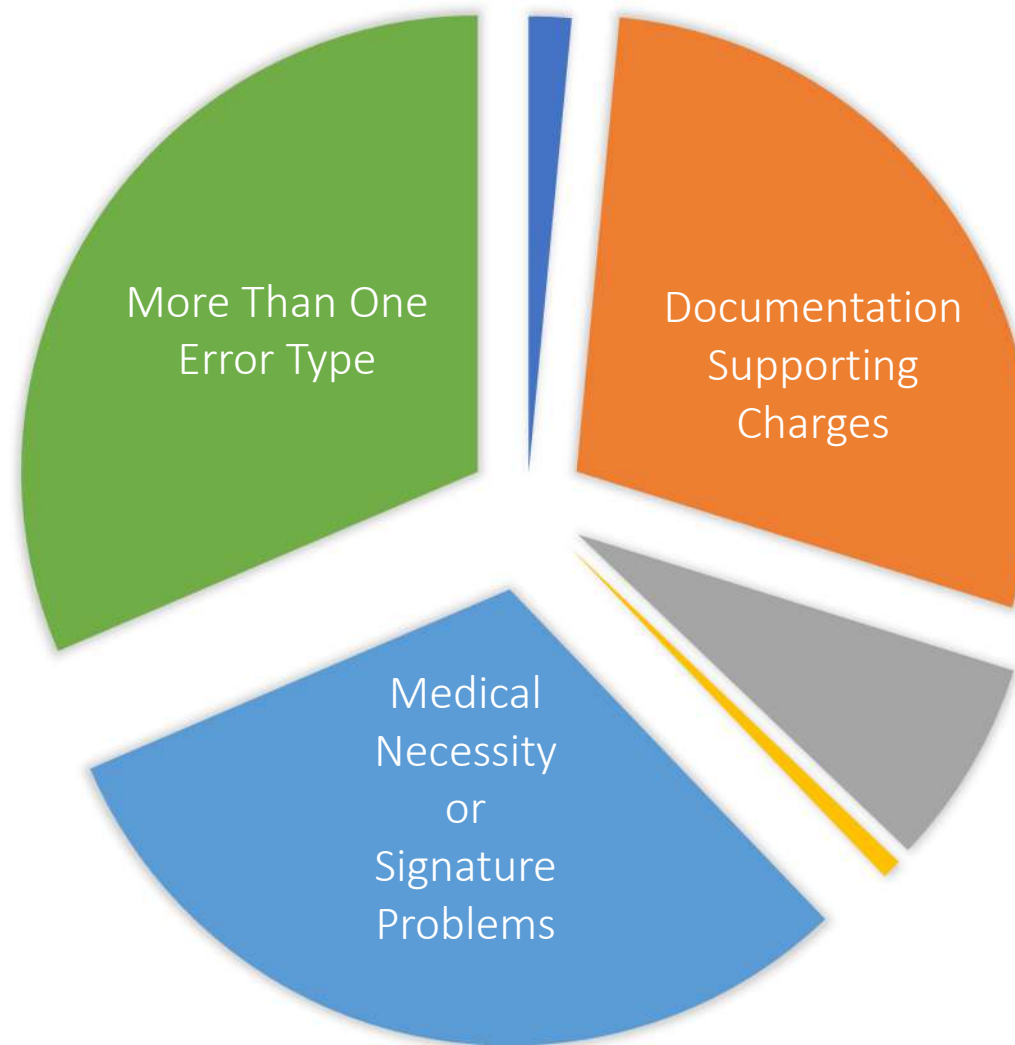
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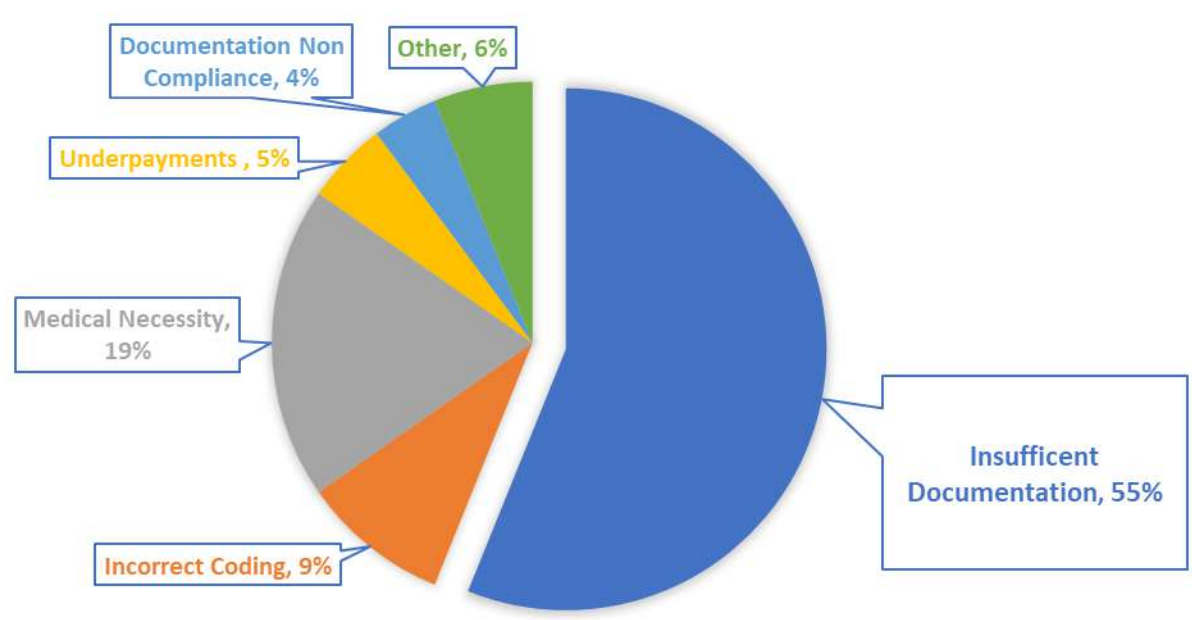
ROOT CAUSES OF INSUFFICIENT DOCUMENTATION



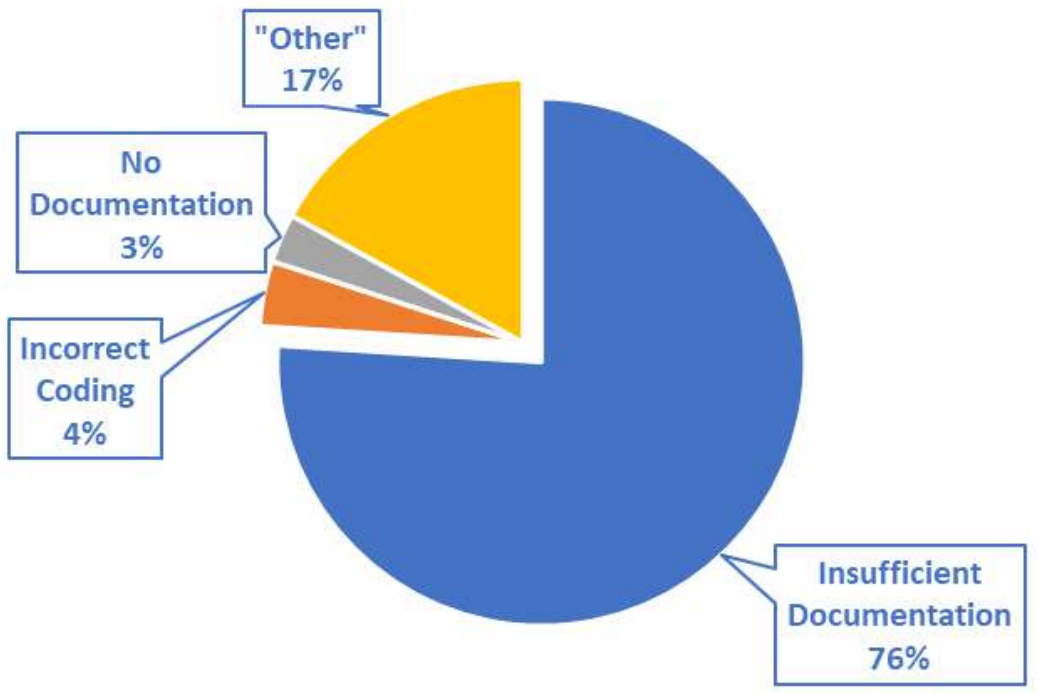
ROOT CAUSES OF INSUFFICIENT DOCUMENTATION



PTIP ERROR TYPES



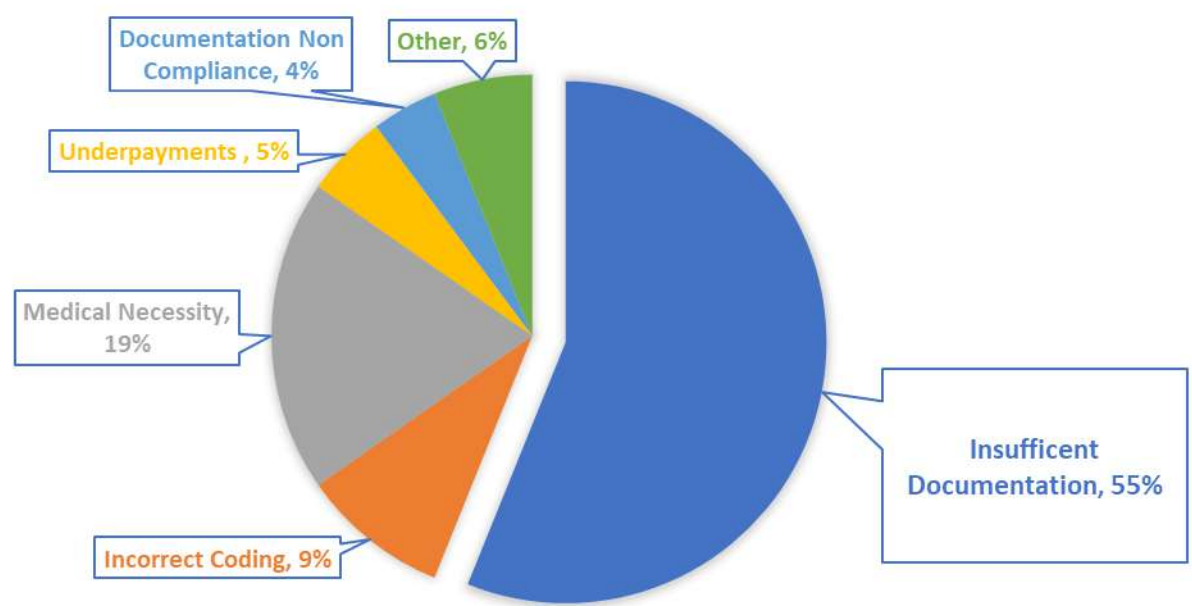
All Providers



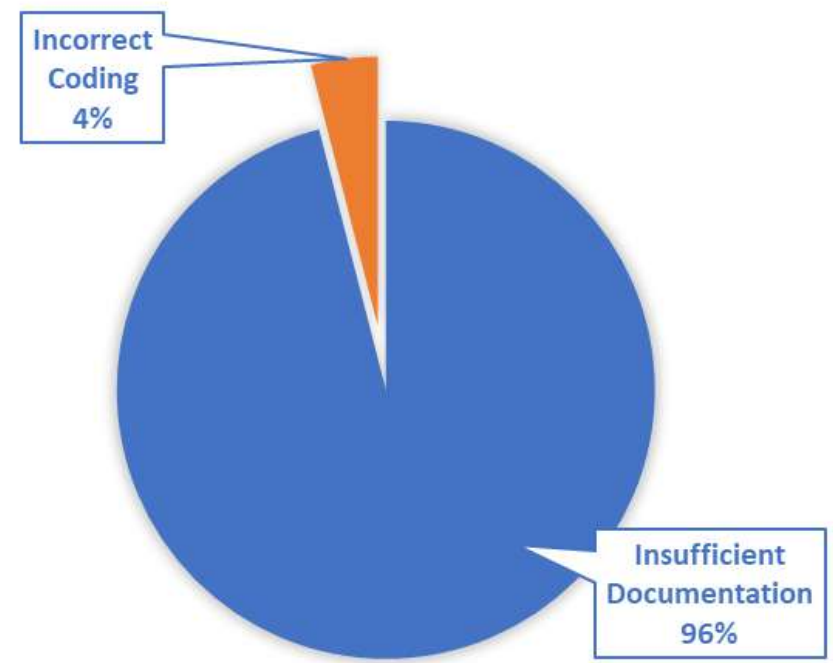
Physical Therapists in Private Practice

[Medicare Supplemental Improper Payment Data 2019](#)

OTIP ERROR TYPES



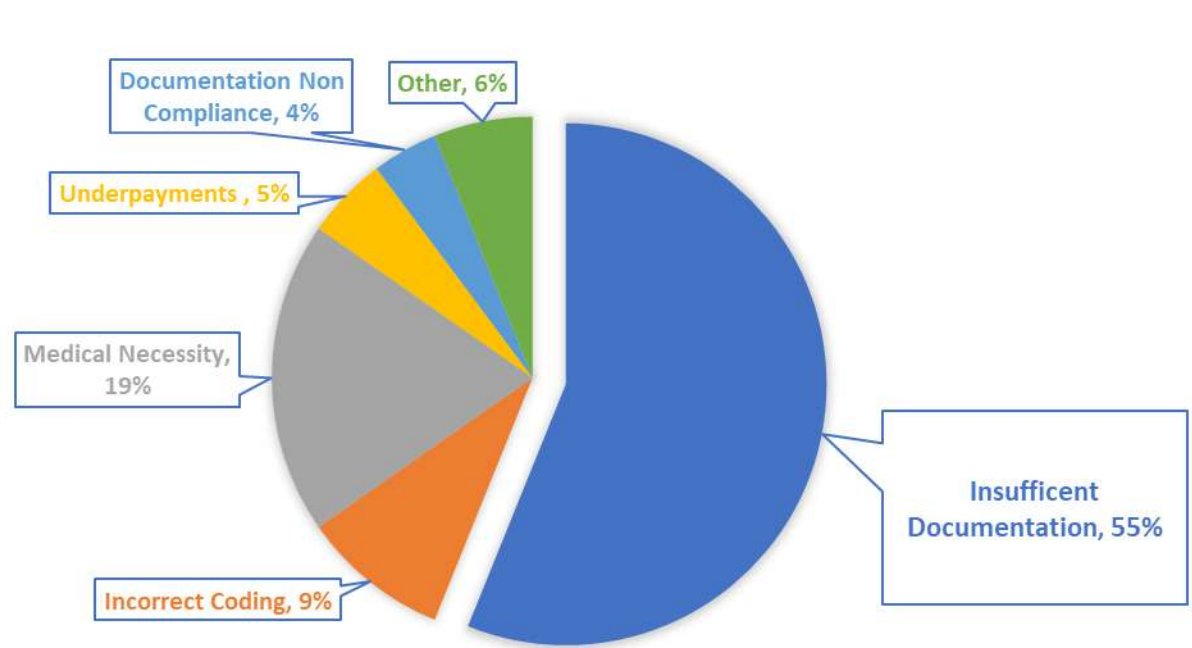
All Providers



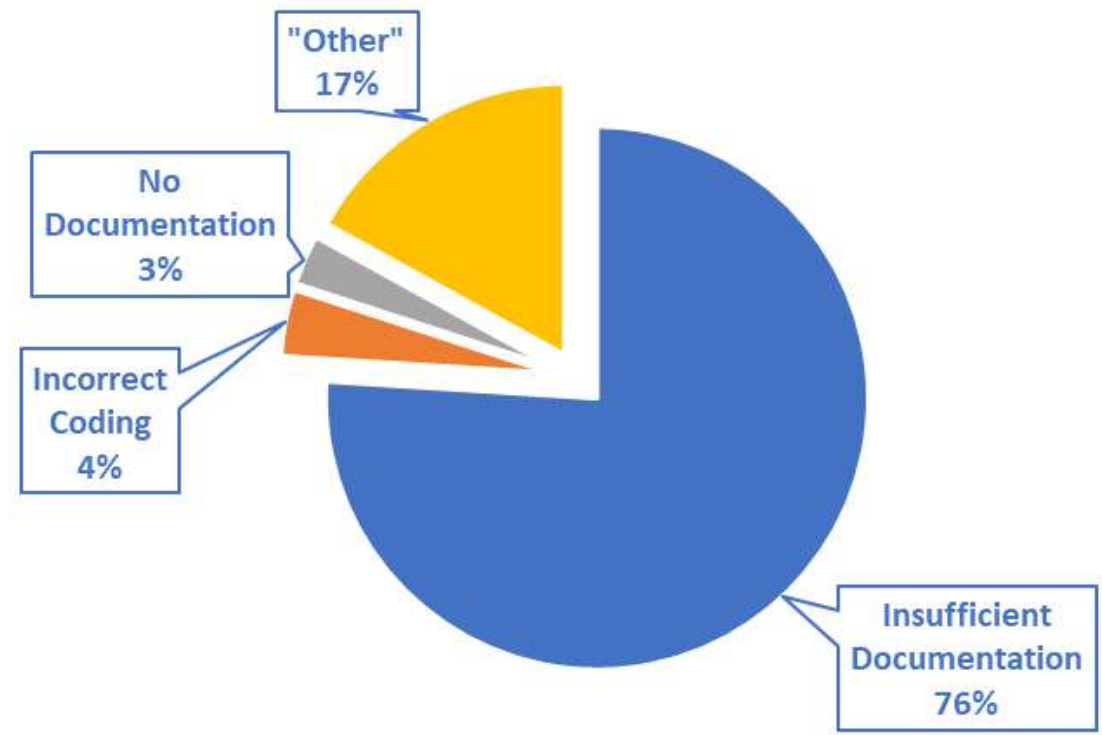
Occupational Therapists in Private Practice

[Medicare Supplemental Improper Payment Data 2019](#)

ERROR RATES BY PROVIDER TYPE



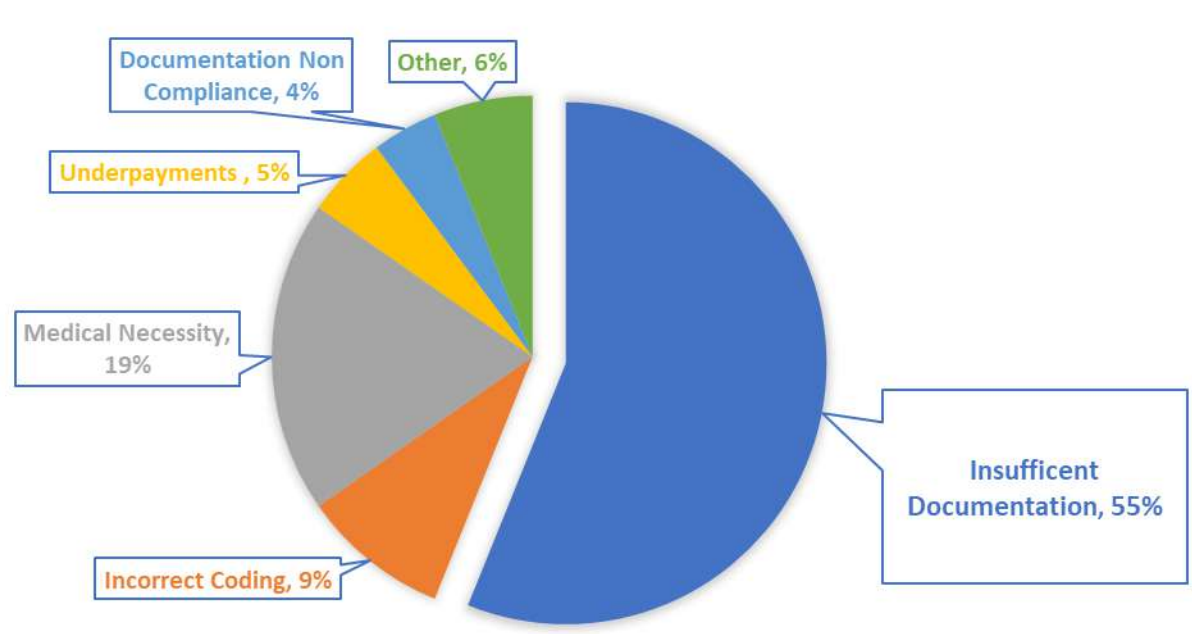
All Providers



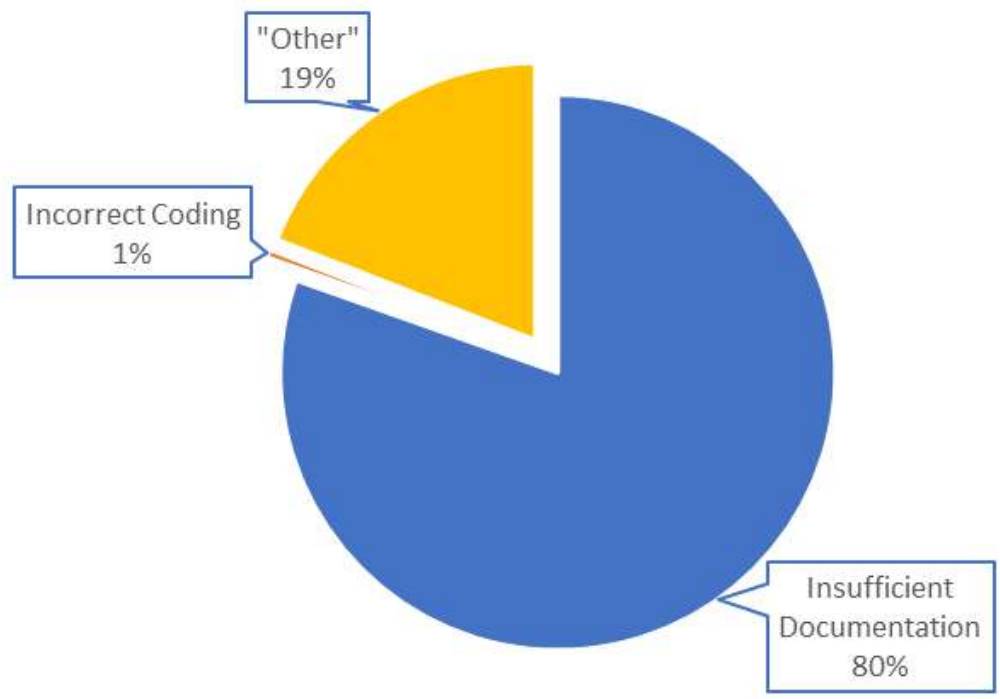
Outpatient Rehabilitation Facilities (ORFs)

Medicare Supplemental Improper Payment Data 2019

ERROR RATES BY PROVIDER TYPE



All Providers



Comprehensive Outpatient Rehabilitation Facilities (CORFs)
[Medicare Supplemental Improper Payment Data 2019](#)

PART B IMPROPER PAYMENT RATE

Part B Provider Type	Improper Payment Rate	Projected Total Improper Payments	Percent of Total	Rank
Internal Medicine	13.5%	\$1,171,140,876	3.9%	1
Clinical Laboratory	19.2%	\$720,194,509	2.4%	2
Family Practice	10.3%	\$615,595,816	2.1%	3
Ambulance Service Supplier	9.8%	\$476,977,483	1.6%	4
Physical Therapist in Private Practice	15.2%	\$386,542,656	1.3%	5
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Occupational Therapist in Private Practice	16.0%	\$38,171,727	0.1%	42

[Medicare Supplemental Improper Payment Data 2019](#)

page 57

IMPROPER PAYMENT RATE COMPARISON

Practice Setting	Error Rate	Projected Cost	% of Total
PTIP	15.2%	\$386M	1.3%
OTIP	16.0%	\$38M	0.1%
ORF	5.8%	\$39M	0.1%

IMPROPER PAYMENT RATE COMPARISON

*Overall Error Rate:
7.3%*

Practice Setting	Error Rate	Projected Cost	% of Total
PTIP	15.2%	\$386M	1.3%
OTIP	16.0%	\$38M	0.1%
ORF	5.8%	\$39M	0.1%

OVERPAYMENT RATES BY CODE

Part B Services (HCPCS Codes)	Claims Reviewed	Lines Reviewed	Sample Dollars Overpaid	Total Sample Dollars Paid	Projected Dollars Overpaid	Overpayment Rate
All Codes With Less Than 30 Claims	4,996	8,497	\$57,357	\$961,044	\$2,128,970,771	5.8%
Initial hospital care (99223)	685	686	\$31,867	\$132,362	\$432,620,087	24.0%
Office/outpatient visit est (99214)	483	483	\$2,189	\$47,369	\$404,796,293	4.7%
Subsequent hospital care (99233)	719	963	\$17,734	\$94,438	\$345,812,409	18.0%
Emergency dept visit (99285)	321	321	\$7,338	\$53,017	\$228,420,881	13.8%
Therapeutic exercises (97110)	304	320	\$2,448	\$13,741	\$202,697,906	17.5%
Office/outpatient visit new (99204)	313	313	\$6,773	\$45,697	\$200,369,057	15.0%

[Medicare Supplemental Improper Payment Data 2019](#)

page 70

OVERPAYMENT FOR THERAPEUTIC EXERCISE - 97110

Part B Services (HCPCS Codes)	Claims Reviewed	Lines Reviewed	Sample Dollars Overpaid	Total Sample Dollars Paid	Projected Dollars Overpaid	Overpayment Rate
All Codes With Less Than 30 Claims	4,996	8,497	\$57,357	\$961,044	\$2,128,970,771	5.8%
Initial hospital care (99223)	1,511	1,511	\$3,890	\$132,362	\$432,620,087	24.0%
Office/outpatient visit established (99214)	483	483	\$2,189	\$47,369	\$404,796,293	4.7%
Subsequent hospital care (99233)	719	963	\$17,734	\$94,438	\$345,812,409	18.0%
Emergency department (99285)	321	321	\$1,338	\$55,817	\$228,420,881	13.8%
Therapeutic exercises (97110)	304	320	\$2,448	\$13,741	\$202,697,906	17.5%
Office/outpatient visit new (99204)	313	313	\$6,773	\$45,697	\$200,369,057	15.0%

• Overpayment Rate – 17.5%

• Projected Overpaid- \$202,697,906

• Ranks 6th in list of Overpaid Codes

OVERPAYMENT RATES FOR MANUAL THERAPY - 97140

Part B Services (HCPCS Codes)	Claims Reviewed	Lines Reviewed	Sample Dollars Overpaid	Total Sample Dollars Paid	Projected Dollars Overpaid	Overpayment Rate
Initial hospital care (99222)	131	131	\$2,490	\$17,305	\$111,987,273	15.0%
Hospital discharge day (99239)	176	176	\$4,107	\$17,696	\$107,795,571	22.6%
Office/outpatient visit est (99215)	261	262	\$3,709	\$33,619	\$107,640,375	9.8%
Manual therapy 1/> regions (97140)	277	290	\$1,789	\$8,402	\$98,946,482	19.8%

[Medicare Supplemental Improper Payment Data 2019](#)

page 70

OVERPAYMENT RATES FOR MANUAL THERAPY - 97140

Part B Services (HCPCS Codes)	Claims Reviewed	Lines Reviewed	Sample Dollars Overpaid	Total Sample Dollars Paid	Projected Dollars Overpaid	Overpayment Rate
Initial hospital care (99222)	131	131	\$2,490	\$17,305	\$111,987,273	15.0%
Hospital discharge day (99239)	17	17	\$4,100	\$3,695	\$107,795,571	22.6%
Office/outpatient visit est (99215)	261	262	\$3,709	\$33,619	\$107,640,375	9.8%
Manual therapy regions (97140)	277	270	\$1,785	\$8,482	\$98,946,482	19.8%
All Other Codes	11,606	21,360	\$302,934	\$4,630,996	\$2,501,169,312	7.2%

- Overpayment Rate – 19.8%
- Projected Overpaid- \$98,946,482
- Ranks 20th in list of Overpaid Codes

FOUR MOST IMPORTANT DOCUMENTATION PRACTICES

Risk	Do	Don't
Medical Necessity	Be explicit. State <i>why</i> treatment is necessary and track goals	Don't assume someone else will intuitively understand the medical necessity of your treatment
Inconsistent Records	Make sure <i>descriptions</i> of services match the <i>intent</i> of the procedure code	Don't " <i>chase codes</i> "
Inconsistent Records	<i>Review</i> and <i>revise</i> documentation as necessary	Don't clone notes
Signature Problems	Use <i>signature lines</i> . Make sure all signatures are <i>dated</i> .	Don't accept illegible, undated signatures from anyone.

BE EXPLICIT ABOUT MEDICAL NECESSITY

The screenshot displays the InsightGO medical software interface. The top header shows the patient name "Horace Quimby (31)" and a status bar with "104" and "Hello jhenderson.emr". The left sidebar contains navigation options: Demographics, Appointments (4), Attachments, Active Cases (+ ADD), R Shoulder Pain (2), Insurance, Goals (9), and Chart Notes (3). The main content area is titled "Assessment" and includes a "Summary" section with a text input field. Below this is a "Necessity" section with a checkbox "Include all displayed items from this area". The "Necessity" section lists several items with checkboxes and text fields:

- ☒ Exercise Instruction and Monitoring: Correct positioning. Safety. Surgical Precautions.
- ☒ Other Patient Needs: Patient motivation.
- ☒ Accepted Standard of Practice: Amount, duration, frequency and type of treatment is reasonable under the accepted standards of practice.
- ☒ Patient Dependence: Services cannot yet be performed independently by the patient or other caretakers.
- ☒ Rehabilitation Potential: Excellent.

Below the "Necessity" section is a "Diagnosis" section with a checkbox and text field:

- ☒ Shoulder Diagnosis: Impingement Syndrome.

The bottom of the sidebar shows "Current Note Standard Visit 02/06/2020", "Last Note Standard Visit 02/05/2020", and "First Note Initial Eval 02/04/2020".

[Medicare Benefits Policy Manual, Chapter 15](#)
Section 220.2

TRACK GOALS

The screenshot shows the InsightGO interface for patient Horace Quimby (31). The left sidebar contains navigation options: Demographics, Appointments (12), Attachments, Active Cases (+ ADD), Medicare Case (3), Insurance, Goals (8), Chart Notes (9), and All. The main content area displays a list of goals for Medicare Case 3. Each goal entry includes a star icon, a goal number and description, a desired goal date and value, and the last finding date and value.

Goal	Desired Goal	Last Finding
1 : Modified Patient Specific Functional Scale (PSFS)	02/28 10	02/03 3
1A : Overhead Activity Tolerance	02/28 Patient can tolerate continuous overhead activity for 5 min. or longer.	02/03 Patient can tolerate continuous overhead activity for 1 min. or less.
1B : Pain Frequency	02/28 Sporadic, Less Than Weekly.	02/03 Constant.
1C : Recent Symptom Trend	02/28 Condition improving.	02/03 Condition worsening.
1D : Shoulder Flexion Active Range of Motion Right - Shoulder	02/28 180	02/03 125

[Medicare Benefits Policy Manual, Chapter 15](#)

Section 220.3, page 190

COUPLE PROCEDURE DESCRIPTION TO CODE INTENT






InsightGO

104 Hello jhenderson.emr

Horace Quimby (31)

in 08:00 AM out 08:45 AM 50 UNITS 166/45 MIN.

Include all displayed items from this area

<input checked="" type="checkbox"/>	 Bow and Arrow Pulley	Minutes 8	S 3	R 15	Lbs 5	CPT Code 97110	Performed By Henderson, Jer...	Notes scapular stabilization
Exercise								
<input checked="" type="checkbox"/>	 Diagonal Pull Downs	Minutes 8	S 3	R 15	Lbs 5	CPT Code 97110	Performed By Henderson, Jer...	Notes
Pulley Exercise								
<input checked="" type="checkbox"/>	 Resisted Shoulder	Minutes 8	S 3	R 15	Lbs 5	CPT Code 97110	Performed By Henderson, Jer...	Notes "set" scapula
Abduction Pulley Exercise								
<input checked="" type="checkbox"/>	 Resisted Shoulder	Minutes 8	Sets 3	Reps 15	Kg	CPT Code 97110	Performed By Henderson, Jer...	Notes
Adduction Pulley Exercise								
<input checked="" type="checkbox"/>	 Resisted Shoulder	Minutes 8	Sets 3	Reps 15	Kg	CPT Code 97110	Performed By Henderson, Jer...	Notes
Adduction Pulley Exercise								

*Especially important with
Therapeutic Exercise and
Manual Therapy*

Medicare Benefits Policy Manual, Chapter 15

Section 220.2

REVIEW AND REVISE DOCUMENTATION AS NECESSARY

The screenshot shows the InsightGO EMR interface for a patient named Paul Pettygrove (20). The interface is divided into a sidebar on the left and a main content area. The sidebar contains navigation options: Demographics, Appointments (4), Attachments, Active Cases (+ ADD), and Chart Notes (4). The main content area displays a 'Subjective' section with a 'Summary' field and a 'Pain' section. The 'Pain' section includes 'Pain Frequency' and 'Continuous Activity Tolerance' subsections. A 'Show Past Fields' button is visible in the top right of the main area.

InsightGO 105 Hello jhenderson.emr

Horace Quimby (31) Paul Pettygrove (20)

in 08:00 AM out 08:45 AM UNITS 0/45 MIN

Subjective

Summary
Enter summary text here

☐ Include all displayed items from this area

Pain

☐ ★ Pain Frequency *** *Constant.

Continuous Activity Tolerance

☐ ★ Overhead Activity Tolerance *** *Patient can tolerate continuous overhead activity for 1 min. or less.

Show Past Fields

★ 2 ADD

TELL A STORY

The screenshot displays the InsightGO EMR interface for a patient named Horace Quimby. The interface includes a sidebar with navigation options like Demographics, Appointments, Attachments, Active Cases, Insurance, Goals, and Chart Notes. The main content area shows the patient's chart with sections for Subjective, Summary, Pain, Continuous Activity Tolerance, General Health Questions, and Onset. A magnifying glass highlights the 'Show Past Fields' button in the top right corner of the chart area.

Review and revise documentation from past visits as necessary

USE SIGNATURE LINES

Plan of Care Approval

Thank you for this referral. We are required to obtain an approval of Horace's plan of care. You may approve the plan of care and make any changes to the plan of care by commenting below. As always, please feel free to call us at (555) 555-5555 if you have any questions or concerns.

Respectfully yours,



Electronically signed by:
Jerry Henderson, PT
02/08/20 12:26 pm
License: ID 12345678

Please fax approval to (555) 555-5555

- ☐ Approval of the plan of care as documented
- ☐ Plan of care is not approved. Ask patient to return to my office.
- ☐ Approval of the plan of care with these changes:

Signature and Date:

Doogie Howser, MD

___/___/___

IN A NUTSHELL...

- PTs and OTs in independent practice have high error rates
- PTIPs rank 5th overall in total improper payments
- “Insufficient Documentation” is our biggest risk
 - Establish Medical Necessity
 - Tell a Story
 - Eliminate Signature Problems
- Support Procedure Code Intent with Documentation
 - Special Caution with High Overpayment Codes (97110, 97140)

QUESTIONS AND COMMENTS

POLL QUESTION

THANK YOU.

