



# CMS' Comparative Billing Reports (CBRs): Compliance Tools for Physicians and Other Outpatient Providers

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Annie Barnaby, CPC, CRC, CASCC

Kimberly Hrehor, MHA, RHIA, CHC, PMP



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## Agenda

- What is a CBR?
- Common Questions
- Recent CBR Topics
- Future CBR Topics
- How to Access a CBR
- Tips for Reviewing a CBR
- References and Resources

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## What Is a CBR?

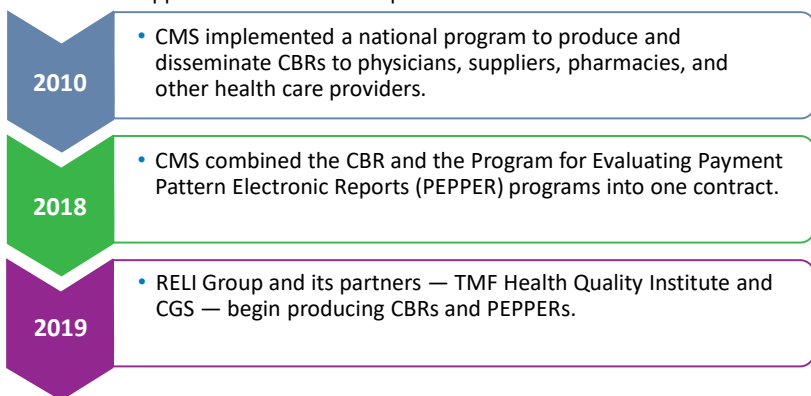
- CBRs are free, comparative data reports.
- The Centers for Medicare & Medicaid Services (CMS) defines a CBR as an educational resource and a tool for possible improvement.

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## 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.



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## Common Questions

- What is the purpose of a CBR?
- Why does CMS issue CBRs?
- How are CBR topics selected?
- Are CBRs publicly available?
- Why did I receive a CBR?
- What is the source of the data in the CBR?
- Have I done something wrong?
- Do I have to take any action?

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## What Is the Purpose of a CBR?

- A CBR is an educational tool that reflects your billing and/or prescribing patterns as compared to your peers' patterns for the same services in your state or specialty, and nationwide.
- A CBR is intended to enhance accurate billing and/or prescribing practices, as well as support providers' internal compliance activities.
- The CBR program helps CMS protect the Medicare Trust Fund and manage Medicare resources.

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## 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 specific coding guidelines and billing information
- Informs providers whose billing patterns differ from those of their peers

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## How Are CBR Topics Selected?

- CBR topics are selected to combat any coding or billing issues that may pose a threat to the Medicare Trust Fund.
- CMS, RELI Group, Inc., and other trusted partners provide research and review to identify potential CBR topics.
- Resources used in past CBR reviews:
  - Office of Inspector General (OIG)
  - Comprehensive Error Rate Testing (CERT) reports
  - Clinical specialty journals and studies

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## Are CBRs Publicly Available?

- CBRs are not publicly available; they are only accessible to the providers who receive them.
- Contact information for CBR delivery is obtained from the Provider Enrollment, Chain, and Ownership System (PECOS).
- An email from [cbrpepper.noreply@religroupinc.com](mailto:cbrpepper.noreply@religroupinc.com) is sent with information about how to access to your report online.
- A copy of your report is also mailed to the address listed in PECOS.

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## Why Did I Receive a CBR?

- A CBR was presented because your billing patterns differ from your peers' patterns, based on comparisons on a state, specialty, or nationwide level.
  - Receiving a CBR is not an indication of or a precursor to an audit.



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## What Is the Source of the Data in the CBR?

- CBRs analyze Medicare Fee-For-Service claims data.
  - Claims from Medicare Advantage plans are not included in CBR analyses.
- Analysts download information from the paid claims database through direct contact and cooperation with CMS.
- Following the submission and processing of claims, 90 days are allowed to pass before the CBR team downloads the data. This helps ensure accurate, current claims data for download and analysis.

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## Have I Done Something Wrong?

- Receiving a CBR is not an indication of wrongdoing or a precursor to an audit.
- CBRs are intended to educate providers, enhance accurate billing practices, and support providers' compliance activities.

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## Do I Need to Take Action?

- The receipt of a CBR does not require any action on the part of the provider.
- A CBR can help provide focus on billing and coding processes and support internal compliance.

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## Recent CBR Topics

- Lower Extremity Joint Replacement
- Peripheral Vascular Intervention for Claudication
- Subsequent Nursing Facility Evaluation and Management Services
- Office Visits, New and Established Patients by Nurse Practitioners
- Therapeutic Injections and Infusions
- Breast Re-Excision
- Critical Care
- Orthoses Referring Providers
- Intensity-Modulated Radiation Therapy
- Initial Preventive Physical Examination and Annual Wellness Visits

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## Future CBR Topics

- Comprehensive Eye Examinations
- Chronic Care Management
- Wound Debridement
- Drugs of Abuse Testing

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## How to Access Your CBR

- Visit the online portal:
  - <https://cbrfile.cbrpepper.org/>
- Enter your information and verification code.
  - The verification code is provided via email notification and in the mailed CBR.
- CBRs are also mailed to the physical address listed in PECOS.
- Contact our Help Desk to request information about whether CBRs are available for specific providers.

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## CBR Portal



### 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.

Your Information		Provider Information	
First Name	Last Name	Provider Name	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Email		Provider City	Provider State / Territory
<input type="text"/>		<input type="text"/>	<input type="text"/>
Confirm Email			
<input type="text"/>			

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 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)  
 Heard an announcement on a recent CMS Open Door Forum  
 OTHER  
 None of the above

CMS National Provider Identifier (NPI)

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

Validation code

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## Tips for Reviewing a CBR

- Read the CBR information and metrics carefully.
- Check your records against the data in the CBR.
- Utilize the data tables to understand the metric calculations.
- Share the CBR with others who may benefit from the information or can assist with report interpretation.

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## Tips for Reviewing a CBR, Continued

- Review your results considering the following:
  - Patient population
  - Referral sources
  - Specialty procedures performed
- Review perceived inconsistencies with your internal billing and coding department to identify claims billing processes.

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## Strategies to Consider

- Do not panic!
  - Outlier status does not necessarily mean that compliance issues exist.
- However, determine why you are an “outlier.”
  - Do the statistics reflect your operation? What about your specialized programs/services, patient population, referral sources, or health care environment? Verify through the following means:
    - Sampling claims, reviewing internal billing patterns
    - Reviewing claim submissions and/or patient documentation; was it coded and billed appropriately based upon documentation in the medical record?
- Ensure you are following best practices, even if you are not an outlier.

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## References and Resources Available

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

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## References and Resources Available

- Resources for each CBR release:
  - Educational webinar
  - Sample CBR document
  - Q&A document
  - National and state/specialty data

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## Questions or Comments?