



## Identifying Fraud, Waste & Abuse in Behavioral Health

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### Agenda Topics

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- Description of OptumHealth Behavioral Solutions (OHBS)
- Why Bother Pursuing FWA in Behavioral Healthcare?
- Unique Characteristics of Behavioral Health Treatment
- Tools to Identify FWA Activity in Behavioral Health
  - Routine Outpatient Management of Outliers – Member Centric
  - Practice Management Activity – Provider Centric
- Intervention Strategies
- Review of Provider Practice Analysis (PPA) Tool
- Case Examples
- Emerging Areas of Potential FWA Activity



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## OptumHealth Behavioral Solutions Company Description

### **OptumHealth Behavioral Solutions (OHBS) Company Description**

- Manages behavioral health services for over 50 million members
- Customers include health plans, government entities, and direct employer groups
- OHBS takes full risk for some customers, while others prefer an administrative services only (ASO) relationship
- OHBS has over 100,000 providers and 3000 facilities in its network
- OHBS manages all levels of behavioral health care depending on member's Certificate of Coverage (COC) and customer contract
  - Employee Assistance Programs (EAP)
  - Inpatient
  - Residential
  - Partial Hospitalization
  - Intensive Outpatient Care (aka Structured Outpatient Care)
  - Outpatient (approximately 60% of all benefit expense)
    - Routine
    - Nonroutine (e.g., ECT, psychological testing, biofeedback, suboxone)
- Today's presentation focuses primarily on identification and intervention of FWA within the Outpatient arena



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## Why Bother Pursuing FWA in Behavioral Healthcare?

### **Pursuing FWA in Outpatient Behavioral Health**

- Historically, OHBS focused on management of higher intensity/cost services – not routine outpatient services
- Approximately 60% of benefit expense is payment for outpatient services
- Changes in federal regulation regarding Mental Health Parity
  - Lifting of benefit limitations
  - Lifting of ability to manage with traditional procedures such as precertification
  - Regulation does allow for analysis and management of FWA assuming similar to medical management
- Challenge from national political leadership and OHBS leadership to “bend the curve” on inappropriate healthcare expenditures
- Opportunity to make sure stakeholders “get what they pay for”
- It's the right thing to do!



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## Unique Characteristics of Behavioral Health Treatment

### How Behavioral Health Differs From Medical Health

- Three primary provider types – all of whom can provide psychotherapy, but charge different fees
  - Board Certified Psychiatrists (MD)
  - Licensed Psychologists (Doctoral Level)
  - Licensed Master's Level Therapists (e.g., clinical social work, family therapists, professional counselors)
- Must often rely on self-report to understand provider's expertise
- The type of therapy provided often depends on the type of training received by the therapist, rather than a national standard of care for a particular diagnosis or procedure
- Psychotherapy is often a continuous treatment process, extending over significant periods of time – more similar to physical therapy than other medical treatments
- Psychotherapy can be provided individually, with the family, or in group
- The standard psychotherapy session is a 45-50 minute individual session (i.e., 90806)
- Evening hours are standard



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## Tools for Addressing Fraud, Waste and Abuse in Behavioral Health

Identification & Intervention

### **Routine Outpatient Management of Outliers – Member Centric**

- The OHBS ALERT Outpatient Program was developed in 2007 to identify and stratify outpatient members based on
  - potential clinical risk
  - risk of overutilization of routine outpatient services
- Stratification accomplished via suite of algorithms run daily
  - Algorithms run on both clinical data and claims data
  - Identifies approximately 15% of outpatient population
- Interventions
  - correspondence “alerting” practitioner to identified clinical risk or
  - telephonic outreach to practitioners by a licensed clinician to discuss medical necessity for each case identified, including review of claims
  - Peer review when indicated, and potential denial of payment for services if care deemed not medically necessary



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### **Evolution of Member Centric ALERT Approach to Practice Management**

- Same providers often surfaced for review due to clinical reasons
  - Long lengths of stay/frequent visits
  - Ineffective treatment plans and lack of progress
  - Inappropriate use of procedures or interventions for diagnosis in question
- Rendering provider on claim upon telephonic outreach indicated s/he was not the actual provider of care in some instances
  - Rendering provider unlicensed
  - Rendering provider OON
- Members who are reimbursed directly if provider is OON sometimes submit claims for services not rendered
- Providers sometimes manipulate CPT codes to obtain reimbursement for non-covered services
- Vital to have full claims history available to care advocates when conducting telephonic review
- Vital to have referral mechanism for staff who uncover above stated activity



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### **Practice Management Intervention Process**

- Team reviews analyses of algorithms to determine providers of interest.
  - Overall benefit expense paid to provider
  - Review of Practice Pattern Analysis (PPA) to drill down regarding algorithms triggered
- Once identified, the Practice Specialist structures an internal meeting with vested parties
  - Clinical Operations
  - Network Services
  - Account Management
  - Clinical Peer
- Internal meeting agenda includes:
  - Review of PPA and relevant claims data set
  - Review of complaints/credentialing history if available
  - Development of intervention strategy



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## Practice Management Intervention Process (continued)

### • Potential Intervention Strategies

- Almost always includes a direct discussion with the provider in order to determine whether we are dealing with a true practice pattern, or a billing pattern
- Education
- Peer review activity if questions of medical necessity are present
- On-site or desktop audit

### • Potential Results of Intervention

- Ongoing monitoring
- Corrective action plan
- Adverse benefit determination(s)
- Referral to Credentialing Committee with recommendation for termination
- Referral to Special Investigations Unit (SIU) if prospective flag needed or recoupment opportunities identified



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## Practice Management Algorithms

### Algorithms Developed Based on ALERT Program Evolution

- Provides services more than 8 hours per day
- Provision of high intensity/high cost services
- Provision of high frequency services (i.e., multiple visits per week)
- Provision of services to members for prolonged periods of time (i.e., long lengths of stay)
- Provision of services to multiple family members
- Provision of multiple services on the same day
- Provision of services to members already in treatment with other providers
- Use of same diagnosis for most patients
- CPT codes billed don't match provider type
- Provision of services on weekends/holidays

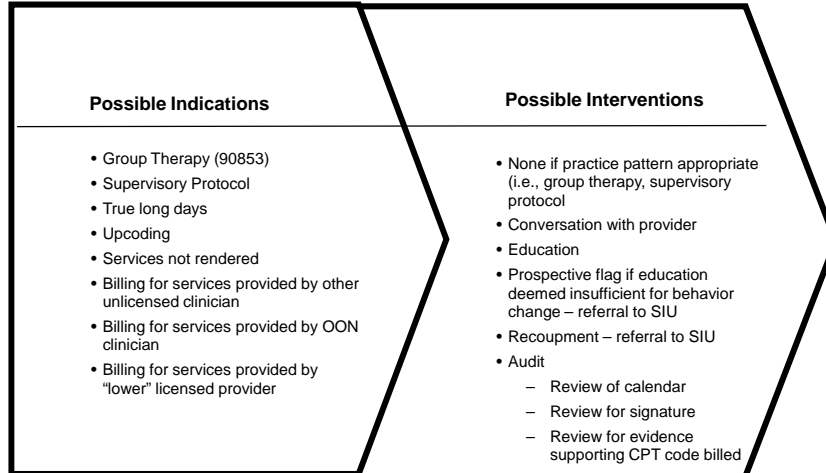


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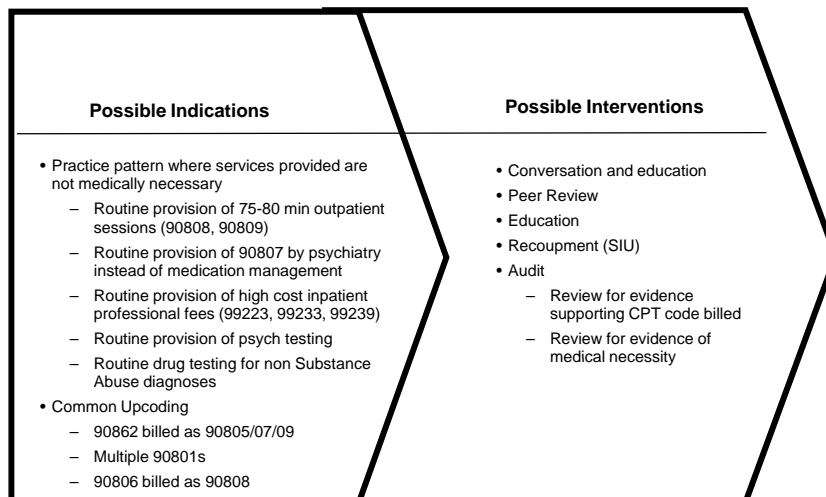
## Provide Services Greater than 8 Hours Per Day

- Important to distinguish between a true practice pattern and a billing pattern



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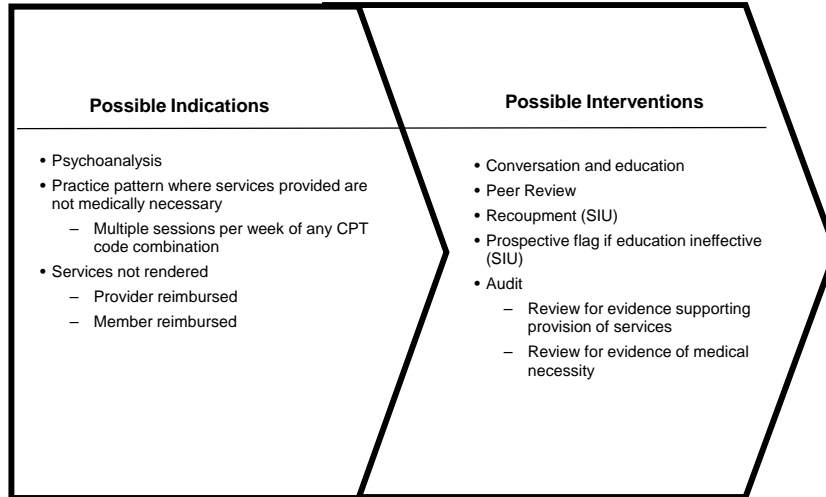
## Routine Provision of High Intensity/High Cost Services



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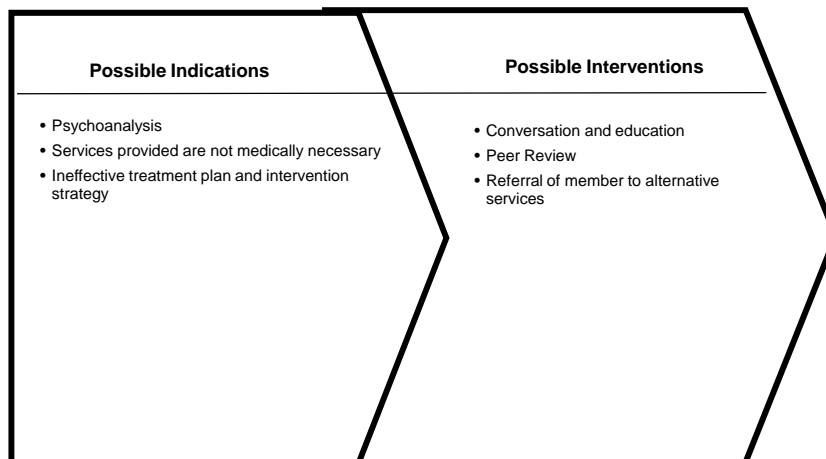
## Routine Provision of High Frequency Services



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## Routine Provision of Prolonged Services (i.e., long lengths of stay)

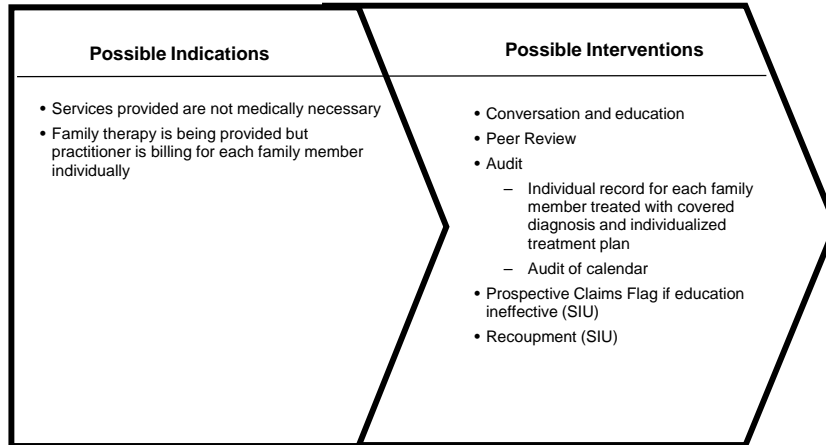
- 90% of outpatient treatment episodes are completed w/in 20 sessions
- The modal treatment episode is one



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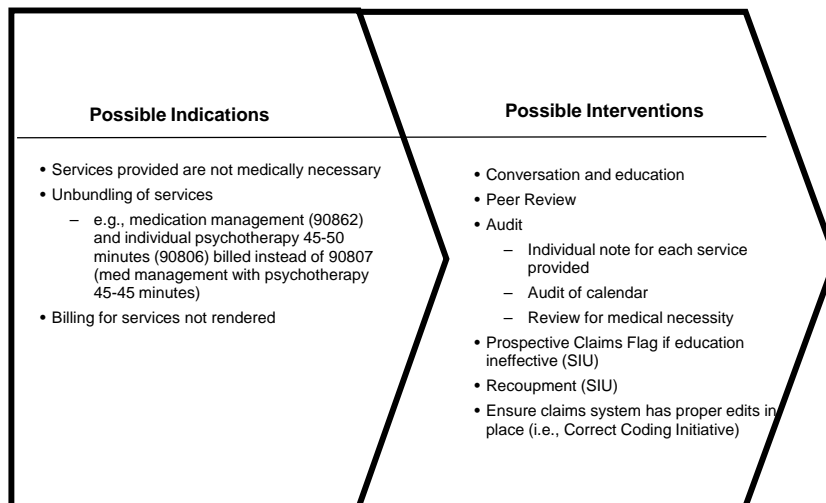
## Multiple Family Members

- Pay particular attention to services provided on the same day
- More difficult to determine with Medicaid members as subscriber IDs are idiosyncratic to child, rather than family



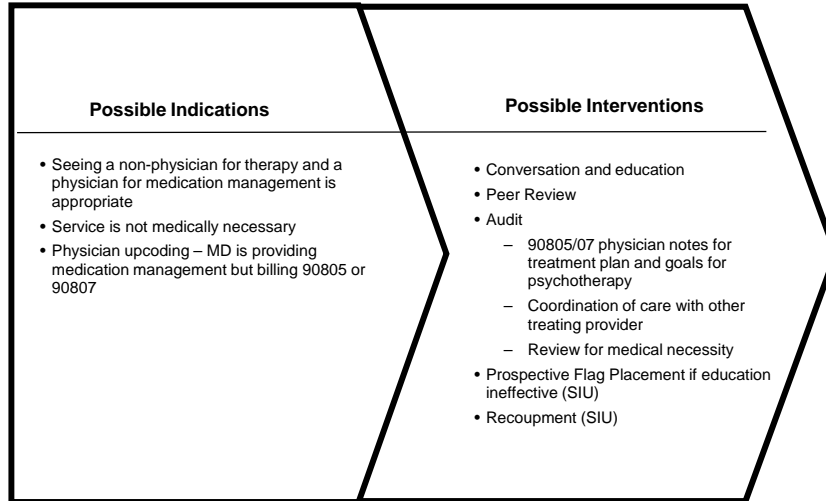
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## Multiple Service on Same Day (Crossbilling)



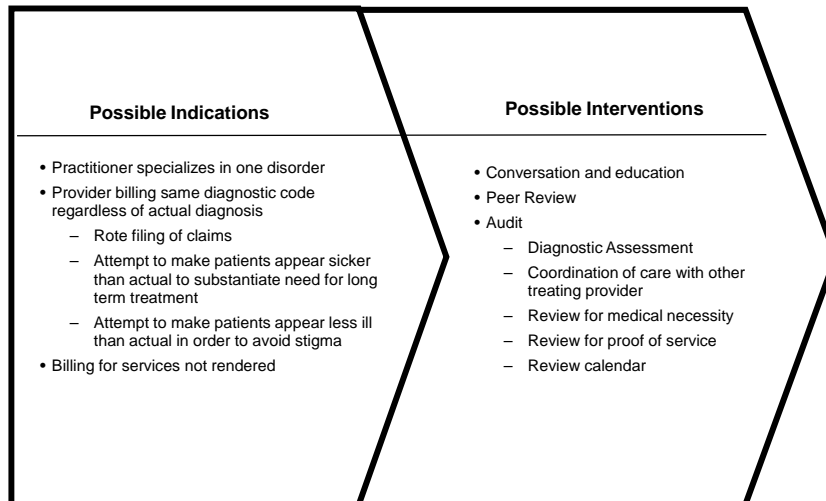
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## MD Provision of Services to Members Already in Outpatient Treatment



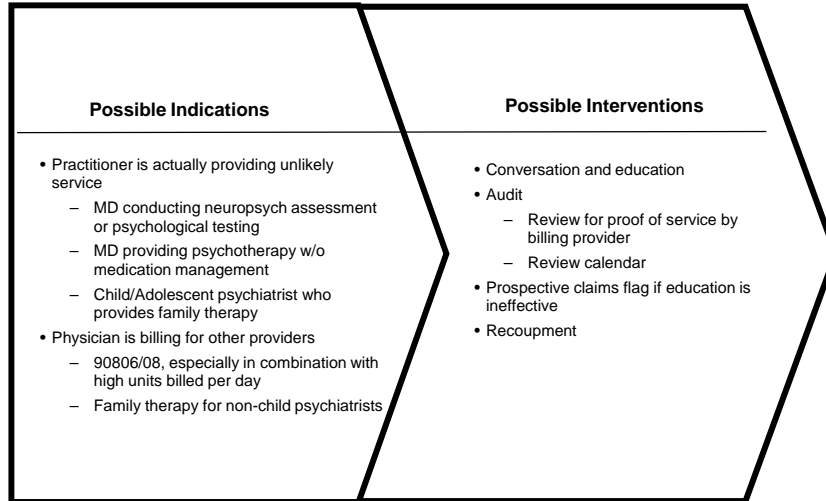
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## Use of Same Diagnosis Across Patients



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## CPT Codes Billed Don't Match Provider Type



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## Provider Profile Analysis (PPA) Tool

## PPA Example – Northern California Psychiatrist – Multiple Patterns

### UBH Provider Pattern Overview

Provider Name:  
Tax ID:  
Data pulled for UCR: 01/01/2005-09/26/2011

#### Cross Billing

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	# EPISODES	PAID AMT	% PTS	% EPISODES	% PAID
One distinct CPT code was billed for a given patient on a given day	01/04/2005	12/13/2010	292	2,678	\$339,413.78	84.4%	30.6%	39.1%
Multiple CPT codes were billed for a given patient on a given day	07/21/2005	10/27/2010	228	6,029	\$528,065.85	65.0%	69.2%	60.5%

#### Multiple Family Members in Treatment

PATTERN DESC	FIRST DOS	LAST DOS	# FAM	PAID AMT	AVG MIN	% FAM	% PAID
One family member in treatment	01/04/2005	12/13/2010	287	\$580,564.63	1.00	89.7%	66.9%
Multiple family members in treatment	02/07/2005	11/24/2010	33	\$298,985.00	2.56	10.3%	33.1%

#### Multiple Family Members in Treatment on a Given Day

PATTERN DESC	FIRST DOS	LAST DOS	# DAYS	PAID AMT	% DAYS	% PAID
One family member was seen on a single day	01/04/2005	12/13/2010	4,687	\$737,019.63	92.85%	85.0%
Multiple family members were treated on a single day	02/28/2005	11/17/2010	361	\$130,530.00	7.15%	15.0%

#### Frequency of Sessions

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	PAID AMT	% PTS	% PAID
Mbr averaging one or less sessions per wk	01/04/2005	11/29/2010	96	\$57,722.28	27.75%	6.7%
Mbr averaging multiple sessions per wk	01/04/2005	12/13/2010	250	\$809,827.55	72.25%	93.3%



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## PPA Example – Northern California Psychiatrist – Multiple Patterns (continued)

#### CPT Code Patterns

PATTERN DESC	FIRST DOS	LAST DOS	# UNITS	PAID AMT	AVPP	% PAID
All other CPT codes	01/04/2005	12/13/2010	7,564	\$132,462.29	23.88	84.4%
High rated CPT codes	01/04/2005	08/18/2010	418	\$81,478.77	8.07	9.4%
CPT code 90801	01/06/2005	11/16/2010	369	\$53,649.12	1.20	6.2%

#### More than 8 units per day

PATTERN DESC	FIRST DOS	LAST DOS	# DAYS	PAID AMT	% DAYS	% PAID
Provider billed 5 or less units of service for a given day	01/04/2005	12/13/2010	742	\$361,916.09	64.13%	41.7%
Provider billed more than 6 units of service for a given day	09/09/2005	10/10/2010	410	\$505,033.04	35.87%	58.3%

#### Extended Treatment Episodes

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	PAID AMT	% PTS	% PAID
20 or less sessions	01/04/2005	12/09/2010	223	\$186,064.96	64.45%	21.4%
21-40 sessions	01/06/2005	12/01/2010	61	\$178,719.67	17.63%	20.6%
41-60 sessions	02/14/2005	12/06/2010	18	\$84,580.00	5.20%	9.7%
61-80 sessions	10/27/2005	12/13/2010	13	\$96,805.00	3.76%	11.2%
100+ sessions and length of stay greater than one year	02/02/2005	12/09/2010	12	\$158,285.00	3.47%	18.2%
81-100 sessions	06/01/2005	12/08/2010	17	\$162,855.00	4.91%	17.6%
Over 100 sessions and length of stay less than one year	03/07/2006	06/29/2009	2	\$10,240.00	0.58%	1.2%



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## Northern CA Psychiatrist – Crossbilling Detail (continued)

Table 4 - Provider Claims Summary by Procedure Code Combination (billed on same day for same patient)

CPT COMBINATION**	FIRST DOS	LAST DOS	# PTS	# UNITS	# VSTS	SUBMITTED AMT	ALLOWED AMT	PAID AMT
* 90847, 90862	07/21/2006	10/27/2010	198	5,100	2,540	\$719,035.02	\$602,670.00	\$431,940.36
* 90807, 90847, 90862	07/21/2008	04/08/2010	37	489	163	\$78,816.00	\$66,246.00	\$47,286.00
* 90801, 90847, 90862	01/25/2006	08/10/2010	49	156	52	\$29,025.00	\$20,075.00	\$16,215.00
* 90801, 90862	08/18/2005	03/11/2010	47	96	47	\$16,745.01	\$10,560.00	\$8,831.97
* 90801, 90847	04/27/2006	07/14/2010	24	50	25	\$11,545.00	\$7,810.00	\$7,000.00
* 90808, 90847, 90862	10/01/2007	02/02/2009	7	32	6	\$6,680.00	\$4,400.00	\$3,757.00
* 90807, 90847	10/28/2009	03/18/2010	7	24	12	\$4,580.00	\$3,145.00	\$2,670.00
* 90801, 90807, 90862	07/21/2008	08/21/2008	7	21	7	\$3,705.00	\$2,695.00	\$2,560.00
* 90847, 99058	09/25/2006	05/22/2007	7	14	7	\$4,195.00	\$2,525.00	\$2,270.00
* 90801, 99058	04/12/2006	06/27/2007	5	10	5	\$3,100.00	\$2,150.00	\$1,960.00
* 90801, 90807, 90847, 90862	08/12/2008	09/25/2008	2	8	2	\$1,410.00	\$1,040.00	\$800.00
* 90808, 90847	07/09/2007	08/13/2007	3	6	3	\$1,785.00	\$855.00	\$754.50
* 90807, 90862	02/28/2006	07/08/2008	3	6	3	\$810.00	\$535.00	\$485.00
* 99058, 99045	08/29/2006	08/29/2006	1	2	1	\$800.00	\$430.00	\$430.00
* 90806, 90847	01/23/2006	07/17/2007	2	4	2	\$865.00	\$415.00	\$375.00
* 90808, 90862	09/29/2005	06/21/2007	2	7	2	\$1,285.01	\$405.00	\$315.00
* 90801, 90807	07/01/2008	07/01/2008	1	2	1	\$480.00	\$310.00	\$290.00
* 90784, 90862	11/10/2008	11/10/2008	1	2	1	\$270.00	\$157.03	\$117.03
* 90847	01/04/2005	12/01/2010	212	1,786	1,781	\$332,125.01	\$228,818.45	\$198,005.41
* 90808	01/21/2005	04/19/2010	42	398	391	\$158,795.00	\$87,140.00	\$76,715.72
* 90801	01/06/2005	11/16/2010	200	227	225	\$58,870.00	\$38,195.00	\$33,132.66
* 90807	08/14/2008	12/09/2010	49	130	126	\$25,340.00	\$16,380.00	\$14,275.00
* 99058	02/09/2005	10/10/2007	23	32	32	\$12,350.00	\$8,000.00	\$7,565.00
* 90805	02/02/2005	11/17/2010	19	41	41	\$5,760.00	\$4,510.00	\$4,030.00
* 90862	07/06/2005	12/13/2010	39	58	59	\$5,465.00	\$3,955.00	\$3,035.00
* 90806	01/05/2010	11/01/2010	4	5	5	\$855.00	\$615.00	\$480.00
* 90809	03/10/2005	03/10/2005	1	1	1	\$400.00	\$250.00	\$245.00

\*\*Excludes invalid codes

## Northern CA Psychiatrist – Multiple Family Member Detail (continued)

Table 6 - Provider Claims Summary by Subscriber ID

SUBSCRIBER ID	FIRST DOS	LAST DOS	# PTS	# DOS	# UNITS	SUBMITTED AMT	PAID AMT	% DAYS - MULTIPLE FAMILY MBRS WERE SEEN
	09/19/2005	10/07/2010	3	94	336	\$54,110.00	\$32,845.00	72.34%
	02/28/2005	06/27/2006	2	7	12	\$2,565.00	\$1,475.00	71.43%
	07/03/2008	11/15/2010	3	61	193	\$29,120.00	\$19,305.00	67.21%
	02/14/2005	08/27/2008	5	33	118	\$22,930.00	\$15,685.00	66.67%
	12/02/2009	11/17/2010	2	23	73	\$11,435.00	\$5,190.00	60.87%
	08/09/2005	05/30/2006	4	41	85	\$16,165.00	\$10,045.00	56.10%
	06/22/2006	06/04/2007	2	13	22	\$4,115.00	\$2,736.00	63.86%
	02/09/2005	08/30/2005	2	19	29	\$5,925.00	\$3,800.00	52.63%
	03/13/2006	12/06/2007	2	30	45	\$8,400.00	\$5,465.00	50.00%
	02/28/2005	07/12/2007	2	29	43	\$7,885.00	\$4,820.00	44.83%
	12/07/2007	10/13/2008	3	18	49	\$7,445.00	\$4,450.00	44.44%
	09/12/2006	12/08/2009	3	83	183	\$29,205.00	\$19,905.00	38.55%
	10/15/2007	10/18/2010	2	44	109	\$16,555.00	\$8,960.00	34.09%
	10/11/2005	11/08/2005	2	3	4	\$870.00	\$440.00	33.33%
	06/01/2005	12/27/2007	4	89	132	\$25,825.00	\$17,385.00	31.46%
	03/07/2006	12/11/2008	2	53	97	\$15,215.00	\$9,700.00	30.19%
	01/09/2008	01/25/2010	2	53	126	\$19,585.00	\$12,405.00	26.42%

## Northern CA Psychiatrist – Units Per Day Detail (continued)

Table 5 - Provider Claims Summary: Day Volume

# UNITS BILLED PER DAY***	FIRST DOS	LAST DOS	# DAYS	PAID AMT
1	01/06/2005	12/02/2010	78	\$8,349.43
2	01/04/2005	12/09/2010	126	\$29,874.25
3	01/31/2005	11/24/2010	153	\$56,881.70
6	02/07/2005	10/18/2010	142	\$102,313.99
7	02/28/2005	09/20/2010	111	\$94,055.48
8	03/10/2005	08/12/2010	69	\$67,209.31
9	10/03/2005	07/05/2010	45	\$47,611.12
10	09/19/2005	04/06/2010	31	\$37,696.30
11	11/01/2005	03/09/2010	16	\$21,989.50
12	10/17/2005	03/15/2010	12	\$17,183.50
13	06/30/2006	01/18/2010	10	\$15,560.25
14	11/06/2006	12/08/2009	3	\$5,109.23
15	02/04/2010	02/04/2010	1	\$1,990.00
16	01/27/2010	01/27/2010	1	\$1,675.00
17	07/21/2008	07/21/2008	1	\$2,740.00
19	01/04/2010	01/04/2010	1	\$2,335.00

\*\*\*Excludes CPT 90862 and 99213



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## Northern CA Psychiatrist – Extended Treatment Detail (continued)

Table 7 - Provider Claims Summary by Patient

SUBSCRIBER	MEMBER NAME	DOB	REL CD	FIRST DOS	LAST DOS	MOST RECENT DIAG CD	# UNITS	SUBMITTED AMT	PAID AMT	VISITS PER WEEK	PRODUCT TYPE
			S	06/29/2005	05/13/2010	30001	216	\$31,000.00	\$19,510.00	0.68	Commercial
			F	10/10/2007	12/01/2010	29670	199	\$30,065.00	\$20,020.00	1.21	Medicare
			E	04/12/2007	12/09/2010	29634	173	\$26,100.00	\$17,510.00	0.91	Medicare
			S	09/19/2005	10/07/2010	29633	141	\$22,050.00	\$13,640.00	0.53	Commercial
			D	03/10/2005	11/17/2010	31401	135	\$20,170.00	\$12,155.00	0.45	Commercial
			S	11/15/2005	08/06/2009	29634	116	\$16,955.00	\$9,015.00	0.60	Commercial, Ur
			S	09/12/2006	12/08/2009	29633	115	\$16,010.00	\$12,315.00	0.68	Commercial
			S	07/07/2005	09/16/2010	30981	111	\$17,610.00	\$10,910.00	0.58	Commercial
			E	04/16/2009	11/17/2010	29630	107	\$16,320.00	\$10,685.00	1.29	Medicare
			E	07/09/2008	12/06/2010	30002	104	\$15,635.00	\$10,300.00	0.83	Medicare
			E	02/02/2005	12/16/2009	30001	102	\$16,250.00	\$10,635.00	0.40	Commercial
			U	09/19/2005	01/13/2010	31400	98	\$15,795.00	\$9,630.00	0.39	Commercial
			E	10/03/2005	05/05/2009	29623	98	\$14,355.00	\$7,475.00	0.52	Commercial, Ur
			D	09/19/2005	07/13/2010	31401	97	\$15,865.00	\$9,575.00	0.39	Commercial
			S	10/20/2005	11/17/2008	29633	97	\$13,530.00	\$8,400.00	0.60	Commercial



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## PPA Example - Georgia Social Worker – Multiple Patterns

### Cross Billing

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	# CPT5000S	PAID AMT	% PTS	% CPT5000S	% PAID
One distinct CPT code was billed for a given patient on a given day	01/03/2005	05/15/2009	45	8,962	\$542,236.07	100.0%	99.6%	99.7%
Multiple CPT codes were billed for a given patient on a given day	01/04/2005	02/03/2007	10	92	\$7,075.20	21.7%	1.0%	1.3%

### Multiple Family Members in Treatment

PATTERN DESC	FIRST DOS	LAST DOS	# FAM	PAID AMT	AVG MER	% FAM	% PAID
One family member in treatment	01/04/2005	05/15/2009	35	\$289,173.67	1.00	88.7%	92.8%
Multiple family members in treatment	01/04/2005	06/07/2009	4	\$269,297.60	3.61	10.9%	47.2%

### Multiple Family Members in Treatment on a Given Day

PATTERN DESC	FIRST DOS	LAST DOS	# DAYS	PAID AMT	% DAYS	% PAID
One family member was seen on a single day	01/03/2004	05/15/2009	5,736	\$362,978.98	21.5%	64.3%
Multiple family members were treated on a single day	01/04/2005	04/30/2009	1,301	\$196,332.19	18.49%	35.7%

### Frequency of Sessions

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	PAID AMT	% PTS	% PAID
Mtr averaging one or less sessions per wk	02/16/2004	12/17/2009	3	\$683.60	6.52%	0.1%
Mtr averaging multiple sessions per wk	01/03/2005	06/16/2009	43	\$548,681.67	93.18%	99.9%



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## PPA Example – Georgia Social Worker – Multiple Patterns (continued)

### CPT Code Patterns

PATTERN DESC	FIRST DOS	LAST DOS	# UNITS	PAID AMT	AVPP	% PAID
All other CPT codes	01/03/2005	05/15/2009	9,036	\$548,014.67	196.43	99.8%
CPT code 90801	02/03/2005	06/03/2008	18	\$1,356.50	1.00	0.2%

### More than 8 units per day

PATTERN DESC	FIRST DOS	LAST DOS	# DAYS	PAID AMT	% DAYS	% PAID
Provider billed 8 or less units of service for a given day	01/03/2005	05/15/2009	739	\$177,220.17	58.56%	32.3%
Provider billed more than 8 units of service for a given day	01/04/2005	04/30/2009	523	\$372,151.00	41.44%	67.7%

### Extended Treatment Episodes

PATTERN DESC	FIRST DOS	LAST DOS	# PTS	PAID AMT	% PTS	% PAID
20 or less sessions	02/16/2005	12/17/2005	4	\$1,334.50	8.70%	0.2%
21-40 sessions	01/04/2005	01/17/2007	5	\$9,577.40	10.87%	1.8%
41-60 sessions	01/06/2005	10/04/2008	5	\$20,640.95	10.87%	3.8%
61-80 sessions	01/11/2005	08/10/2006	2	\$8,868.14	4.26%	1.6%
81-100 sessions	01/04/2005	09/30/2005	3	\$18,506.25	6.52%	3.4%
Over 100 sessions and length of stay less than one year	01/04/2005	09/26/2007	3	\$23,542.50	6.52%	4.3%
100+ sessions and length of stay greater than one year	01/03/2005	05/15/2009	24	\$466,301.43	52.17%	84.9%



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## GA Social Worker – Units Per Day Detail (continued)

# UNITS BILLED PER DAY***	FIRST DOS	LAST DOS	# DAYS	PAID AMT
1	01/03/2005	05/15/2009	167	\$9,167.00
2	01/26/2005	04/06/2009	112	\$12,841.03
3	01/12/2005	03/02/2009	89	\$16,485.08
4	01/17/2005	04/01/2009	49	\$12,436.25
5	01/21/2005	04/03/2009	84	\$25,191.19
6	01/28/2005	03/20/2009	70	\$25,927.44
7	03/03/2005	04/20/2009	74	\$30,190.84
8	01/15/2005	04/14/2009	94	\$44,981.34
9	01/31/2005	04/30/2009	123	\$67,110.18
10	01/08/2005	02/07/2009	99	\$59,250.79
11	01/18/2005	07/26/2008	70	\$46,438.12
12	01/04/2005	07/05/2008	67	\$48,686.84
13	01/06/2005	06/30/2008	59	\$47,748.01
14	03/22/2005	07/09/2007	35	\$28,488.00
15	02/26/2005	05/07/2007	24	\$21,473.25
16	01/11/2005	06/09/2007	20	\$21,500.25
17	01/20/2005	03/20/2006	7	\$7,845.01
18	02/03/2005	03/31/2007	9	\$10,110.68
19	03/14/2005	05/23/2005	2	\$2,220.00
20	02/07/2005	07/18/2005	6	\$8,805.07
21	07/20/2005	07/20/2005	1	\$1,184.00
22	03/18/2005	03/18/2005	1	\$1,290.00

\*\*\*Excludes CPT 90862 and 99213



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## GA Social Worker – Multiple Family Members Detail (continued)

Table 6 - Provider Claims Summary by Subscriber ID

SUBSCRIBER ID	FIRST DOS	LAST DOS	# PTS	# DOS	# UNITS	SUBMITTED AMT	PAID AMT	% DAYS - MULTIPLE FAMILY MBRS WERE SEEN
	01/03/2005	04/30/2009	5	948	2,328	\$349,256.25	\$148,045.00	75.87%
	01/08/2005	05/07/2009	2	762	1,129	\$169,775.00	\$54,100.00	48.16%
	01/06/2005	06/30/2005	2	84	116	\$17,790.00	\$9,847.50	34.52%
	05/19/2005	04/30/2009	2	574	759	\$114,275.00	\$47,405.00	32.23%



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## GA Social Worker – Extended Visits & Frequency Detail (continued)

Table 7 - Provider Claims Summary by Patient

CURSOR ID	MEMBER NAME	DOB	REL CD	FIRST DOS	LAST DOS	MOST RECENT DIAC CD	# UNITS	SUBMITTED AMT	PAID AMT	VISITS PER WEEK	PRODUCT TYPE	CUSTOMER NAME
			E	01/06/2005	04/30/2009	29689	674	\$101,825.00	\$46,168.75	2.99	Commercial	
			E	01/08/2005	04/30/2009	29689	635	\$95,675.00	\$22,705.00	2.82	Commercial	
			D	01/15/2005	04/30/2009	29689	619	\$92,950.00	\$40,370.00	2.77	Commercial	
			E	05/19/2005	04/30/2009	29689	522	\$78,650.00	\$33,625.00	2.53	Commercial	
			E	06/09/2005	02/09/2009	29689	506	\$75,170.00	\$19,050.00	2.64	Commercial	
			D	02/25/2006	05/07/2009	29689	494	\$74,100.00	\$31,395.00	2.96	Commercial	
			D	01/03/2005	04/03/2008	29633	425	\$63,750.00	\$27,532.50	2.51	Commercial	
			D	01/04/2005	02/25/2008	29633	423	\$63,550.00	\$27,845.00	2.58	Commercial	
			E	06/27/2005	04/30/2009	29633	394	\$59,250.00	\$25,655.00	1.96	Commercial	
			E	01/04/2005	05/15/2009	29689	358	\$54,075.00	\$23,500.00	1.57	Commercial	
			E	05/30/2006	04/30/2009	29689	320	\$49,435.00	\$20,895.00	2.10	Commercial	
			E	01/04/2005	12/15/2007	29689	291	\$42,589.34	\$18,809.34	1.89	Commercial	
			E	05/19/2005	05/26/2007	29689	288	\$41,110.00	\$16,860.00	2.54	Commercial	
			E	12/05/2006	06/30/2008	29633	248	\$37,500.00	\$16,255.00	3.02	Commercial	
			D	03/18/2006	04/30/2008	29689	237	\$36,825.00	\$13,780.00	1.48	Commercial	
			E	06/10/2006	06/28/2007	29633	207	\$31,160.00	\$12,806.00	1.84	Commercial	
			E	01/04/2005	04/13/2008	30981	200	\$30,435.00	\$13,490.00	3.01	Commercial, Ur	
			E	01/04/2005	01/02/2007	29633	187	\$27,181.25	\$7,138.75	1.80	Commercial	



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## PPA Example NY Psychiatrist – High Cost Codes/Non MD Codes/Units Per Day

Table 3 - Provider Claims Summary by Procedure Code

PROC CODE	FIRST DOS	LAST DOS	# PTS	# UNITS	AVPP	SUBMITTED AMT	PAID AMT	% PAID
90907	01/03/2008	06/30/2011	424	3,007	7.21	\$477,419.37	\$300,001.80	96.11%
90900	07/10/2000	06/30/2011	105	745	7.30	\$138,050.91	\$70,590.92	14.45%
90801	01/08/2008	06/28/2011	452	797	1.76	\$118,038.97	\$58,541.68	10.77%
90862	01/14/2008	06/30/2011	282	1,241	4.40	\$113,566.32	\$58,335.66	10.73%
90800	03/24/2009	06/30/2011	114	413	3.62	\$45,378.08	\$20,872.66	4.72%
90619	01/14/2008	03/01/2011	41	145	3.54	\$16,407.89	\$12,105.78	2.23%
90617	01/12/2009	05/03/2011	13	19	1.46	\$2,260.45	\$1,201.20	0.22%
90646	05/05/2009	05/25/2011	6	6	1.00	\$1,440.00	\$815.00	0.15%
98508	10/11/2010	04/25/2011	8	8	1.00	\$2,400.00	\$708.19	0.13%
98338	04/20/2009	05/10/2011	5	7	1.40	\$1,150.00	\$889.87	0.13%
98245	04/13/2010	06/22/2010	1	6	6.00	\$1,200.00	\$540.00	0.10%
90853	03/18/2010	03/02/2011	3	14	4.67	\$1,540.00	\$320.00	0.06%
98255	09/23/2009	12/07/2009	2	2	1.00	\$550.00	\$270.79	0.05%
90847	03/23/2011	06/28/2011	2	2	1.00	\$480.00	\$243.00	0.05%
98305	04/20/2010	05/17/2010	2	2	1.00	\$550.00	\$180.27	0.03%
01963	04/14/2009	04/14/2009	1	1	1.00	\$160.00	\$140.00	0.03%
90804	04/07/2011	06/13/2011	2	2	1.00	\$220.00	\$100.00	0.02%
99904	04/19/2010	04/19/2010	1	1	1.00	\$250.00	\$80.00	0.01%
98233	06/03/2010	06/03/2010	1	1	1.00	\$225.00	\$75.00	0.01%
98327	02/06/2011	02/06/2011	1	1	1.00	\$250.00	\$20.06	0.00%
99199	08/24/2010	08/31/2010	1	2	2.00	\$30.00	\$20.00	0.00%



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### PPA Example NY Psychiatrist – High Cost Codes/Non MD Codes/Units Per Day

# UNITS BILLED PER DAY***	FIRST DOS	LAST DOS	# DAYS	PAID AMT
1	01/14/2008	06/10/2011	96	\$0,228.05
2	01/25/2008	06/27/2011	50	\$9,737.86
3	01/03/2008	06/18/2011	69	\$19,468.74
4	01/11/2008	06/25/2011	81	\$31,924.78
5	02/08/2008	05/11/2011	93	\$45,017.39
6	01/08/2008	06/29/2011	87	\$50,542.38
7	05/20/2008	05/26/2011	59	\$38,662.17
8	04/03/2008	06/30/2011	61	\$44,831.05
9	05/01/2008	06/15/2011	50	\$42,153.95
10	07/10/2008	06/28/2011	43	\$40,538.21
11	02/10/2009	04/21/2011	38	\$38,309.77
12	10/02/2008	06/23/2011	29	\$31,985.71
13	10/09/2008	06/02/2011	20	\$24,128.13
14	04/02/2009	03/24/2011	14	\$18,381.17
15	04/14/2009	01/20/2011	10	\$14,425.91
16	01/06/2009	12/01/2010	6	\$9,111.27
17	05/07/2009	02/23/2010	3	\$5,054.45
18	01/05/2010	04/07/2011	2	\$3,125.31
19	12/08/2009	12/29/2009	2	\$3,518.35
20	03/26/2009	03/26/2009	1	\$2,318.00
21	03/12/2009	03/12/2009	1	\$2,103.00



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### Emerging Areas of Potential FWA Activity

Autism  
Home Health  
Nursing Homes

## Autism

- Recent state mandates to pay for Applied Behavioral Analysis (ABA) services while other customer contracts specifically exclude the service
- ABA services are technically still considered experimental
- ABA services are provided by non-traditional mental health practitioners who are not licensed
- ABA service providers are surfacing across the country with little oversight
- No specified CPT/HCPCS codes for ABA services as of yet
- ABA providers getting around exclusions by billing other codes they are not licensed to provide
  - Health & Behavior Intervention Codes (CPT 96150-96155)
  - Routine outpatient CPT codes at high frequency
- Licensed providers are offering ABA services and billing them as traditional mental health services



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## Home Health

- Watch for CPT codes 99341-99349
- Watch for routine CPT codes (e.g., 90806), extended CPT codes (e.g., 90808/09), or “unlisted service” CPT codes (e.g., 90899) with Place of Service 12
- Watch for multiple family members being seen on same day
- Watch for providers who routinely recommend home health visits for their patients
- Need robust Coverage Determination Guideline (i.e., defined national standard of care) in order to adequately manage – that is, must answer the question “when is in-home mental health treatment medically necessary?”
- Can manage both at the individual member level (via ALERT algorithms) as well as through practice management activity as previously described



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### **Individual Psychotherapy Provided in Nursing Homes & Skilled Nursing Facilities**

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- Look for CPT codes 90816-90822 – individual psychotherapy provided in an inpatient, residential or partial hospitalization setting with Place of Service 30 or 31 (nursing home or skilled nursing facility)
- Look for diagnosis of dementia, particularly moderate or severe
- Look for other diagnoses but high frequency/long duration of service
- Can manage both at the individual member level (via ALERT algorithms) as well as through practice management activity as previously described



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**Questions? Comments? Please contact us!**

We welcome your input and feedback as we continue to refine our approach.

Thank you for your attention and participation today!

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