

# Office of the Inspector General

## Post-Payment Review Comment Grids

The findings and related content detailed within the grids are not exhaustive, and the Office of the Inspector General may reference other findings and/or law or code provisions according to the individuality of the case and documentation provided during the post-payment review.

These grids may be referenced by service providers and the public as informational regarding the operational work of the Office of the Inspector General. Service providers are required to abide by all state and federal laws and regulations. These grids are not to be used by service providers as a checklist, legal advice, or exhaustive resource to ensure compliance with Medicaid requirements.

### Ambulance Services

Revised 9/30/2021				
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
<b>FINDING: LACK OF DOCUMENTATION</b>				
The provider did not submit any documentation for the claim.	The provider must retain records for a period of not less than five years and must submit them to the Wisconsin Department of Health Services (DHS) upon request. The provider did not submit the required records to DHS. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)(a)</a> <a href="#">§ DHS 106.02(9)(c)</a> <a href="#">§ DHS 106.02(9)(f)</a> <a href="#">§ DHS 106.02(9)(g)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(2)(b)4</a> <a href="#">§ 49.45(3)(f)</a>
<b>FINDING: INCOMPLETE DOCUMENTATION</b>				
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The provider did not submit one or more documents required for the claim.	The provider must retain records for a period of not less than five years and must submit them to DHS upon request. The provider did not submit the required records to DHS. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)(a)</a> <a href="#">§ DHS 106.02(9)(c)</a> <a href="#">§ DHS 106.02(9)(f)</a> <a href="#">§ DHS 106.02(9)(g)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(2)(b)4</a> <a href="#">§ 49.45(3)(f)</a>

**FINDING: NON-COVERED SERVICES**

Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
Mileage, additional attendants, and ambulance disposable medical supplies included in claims for emergency medical transportation or for non-emergency medical transportation are not payable without sufficient supporting documentation.	Additional claims for mileage, time, personnel, or supplies are only valid if the claim for emergency medical transportation or non-emergency medical transportation is valid. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(3)(a)(4)</a> <a href="#">§ DHS 107.23(3)(a)(6)</a> <a href="#">§ DHS 107.23(3)(a)(7)</a> <a href="#">§ DHS 107.23(4)(d)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
Emergency transportation of a recipient who is pronounced deceased by a legally authorized person before the ambulance is called is not payable.	Ambulance transportation of a recipient who is pronounced deceased by a legally authorized person before the ambulance is called is considered a non-covered service. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(4)(a)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
If a member is pronounced dead by a legally authorized person after the ambulance is called but before the ambulance arrives at the pick-up site, emergency service only to the point of pick up is covered.	If a member is pronounced dead by a legally authorized person after the ambulance is called but before the ambulance arrives at the pick-up site, emergency service only to the point of pick up is covered. Reimbursement for services from the pick-up point to the hospital is not covered. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(3)(a)(5)(a)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
The trip documentation provided states that the trip was cancelled within the dispatch-to-pickup time period.	The trip documentation provided states that the trip was cancelled within the dispatch-to-pickup time period. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 101.03(103)</a> <a href="#">§ DHS 106.02(9)(a)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(4)(i)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>

The provider was paid for ambulance disposable medical supplies and services that were already included in the ambulance base rate and are therefore not separately reimbursable.	The provider billed and was paid for a quantity greater than that which is allowed by WI Medicaid. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)(a)</a> <a href="#">§ DHS 106.02(9)(e)</a> <a href="#">§ DHS 106.04(5)(a)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
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**FINDING: NOT MEDICALLY NECESSARY** Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The documentation does not indicate that the transportation service was provided to prevent the death or serious impairment of the health of the individual. The individual's medical condition only warranted transportation by non-emergent means (such as common carrier or specialized medical vehicle). Transportation via ambulance was not medically necessary.	Ambulance transportation requires documentation indicating that the service was an emergency service as described in DHS 107.23(1)(b)(1) to provide immediate medical treatment or examination needed to deal with or guard against a worsening of the recipient's condition or as described in DHS 107.23(1)(b)(2). DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 101.03(52)</a> <a href="#">§ DHS 101.03(96m)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(1)(b)</a> <a href="#">§ DHS 107.23(3)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>

**FINDING: INCOMPLETE MEDICAL ORDER** Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The documentation does not include the written specific medical problem from the prescribing provider for the non-emergency medical transportation.	Non-emergency medical transportation by ambulance is a covered service when prescribed by a physician, physician assistant, nurse midwife, or a nurse practitioner on written documentation that states the specific medical problem requiring non-emergency ambulance transport. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(1)(b)(2)</a> <a href="#">§ DHS 107.23(3)(a)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>

The documentation for the non-emergency medical transportation by ambulance does not include the signature from a prescribing provider.	The prescribing provider's signature must be included in the non-emergency medical transportation documentation. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(1)(b)(2)</a> <a href="#">§ DHS 107.23(3)(a)(3)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
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**FINDING: WRONG PROCEDURE CODE** Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The documentation does not indicate the patient was experiencing an emergency condition or situation. The provider was reimbursed for A0427. The reimbursement is adjusted to A0428.	Emergency ambulance services are those services that are necessary to prevent the death or serious impairment of the health of the individual. A0428 is basic life support, non-emergency transport (BLS). A0427 is advanced life support, emergency transport, Level 1(ALS1-Emergency). DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 101.03(52)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(1)(b)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>

**FINDING: BILLED IN EXCESS** Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The provider was paid for ambulance disposable medical supplies and services that are in excess of allowed amounts.	The provider billed and was paid for a quantity greater than that which is allowed by WI Medicaid. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)(a)</a> <a href="#">§ DHS 106.02(9)(c)</a> <a href="#">§ DHS 106.04(5)(a)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>
The provider billed Medicaid for a mileage value that was in excess of the mileage value documented on the trip ticket.	The provider must bill Medicaid for accurate mileage. DHS was unable to verify the actual provision of services, the appropriateness of the service, or the accuracy of the claim.	<a href="#">§ DHS 106.02(9)</a> <a href="#">§ DHS 107.01</a> <a href="#">§ DHS 107.23(4)(d)</a> <a href="#">§ DHS 108.02(9)</a>		<a href="#">§ 49.45(2)(a)10</a> <a href="#">§ 49.45(3)(f)</a>

**FINDING: NO PRIOR AUTHORIZATION**

Revised 9/30/2021

Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
<p>There was no prior authorization for the transportation service provided.</p>	<p>This transportation service requires prior authorization. Any service requiring prior authorization for which prior authorization was not obtained prior to the provision of the service is not covered. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.</p>	<p><a href="#">§ DHS 107.01</a>  <a href="#">§ DHS 107.03(9)</a>  <a href="#">§ DHS 107.23(2)</a>  <a href="#">§ DHS 108.02(9)</a></p>		<p><a href="#">§ 49.45(2)(a)10</a>  <a href="#">§ 49.45(3)(f)</a></p>