## 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 Inespector 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.

## Family Planning Services

PHAKMACY AND PRO	FESSIONAL FINDING: LACK	OF DOCUMENTATIO	N	Revised 9/30/202
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The provider did not submit the requested records to the Wisconsin Department of Health Services (DHS).	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 requested 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.	\$\text{DHS 106.02(9)(a)} \\$\text{DHS 106.02(9)(e)2} \\$\text{DHS 106.02(9)(f)} \\$\text{DHS 106.02(9)(f)} \\$\text{DHS 106.02(9)(g)} \\$\text{DHS 107.01} \\$\text{DHS 108.02(9)} \\$\text{DHS 109.52(7)}	Regulations	\$\frac{\\$49.45(2)(a)10}{\\$49.45(2)(b)4} \\$49.45(3)(f)
PROFESSIONAL FIND	I DING: LACK OF PRIOR AUTH	ORIZATION		Revised 9/30/202
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
There was no prior authorization obtained for a sterilization procedure.	Prior authorization is required for all sterilization procedures. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 107.01 § DHS 107.03(9) § DHS 107.21(2) § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
PROFESSIONAL FIND	DING: LACK OF M.D. ORDER			Revised 9/30/202
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The provider did not obtain an order for services from a valid prescriber.	Providers will not be reimbursed for services provided without a valid prescriber's order. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 105.36(1)(b) § DHS 107.01 § DHS 107.21(1)(a) § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)

PROFESSIONAL FINE	DING: DUPLICATE BILLING			
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Revised 9/30/2021 Wisconsin State Statutes
The provider was reimbursed twice for the same services with the same date of service, procedure code, and quantity of service.	Providers will not be reimbursed for verified duplicate claims. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 101.03(96m) § DHS 106.02(9) § DHS 106.03(2) § DHS 107.01 § DHS 108.02(9)	regulations	\$\frac{49.45(2)(a)10}{\$49.45(3)(f)}
PROFESSIONAL FIND	DING: BILLING IN EXCESS O			Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The member was billed a copayment or deductible.	Members of Medicaid are liable for payment of any copayment or deductible except for family planning services and related supplies. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 104.01(12)(a)1.f § DHS 106.02(9) § DHS 106.03(2) § DHS 107.01 § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
PHARMACY FINDING	E: BILLING IN EXCESS OF SE	RVICES PROVIDED		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
Provider billed and was paid in excess of the quantity that was dispensed.	The quantity reimbursed on the paid claim is greater than the quantity supported by documentation submitted by the provider. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	\$ DHS 101.03(96m)(b)6 \$ DHS 101.03(96m)(b)9 \$ DHS 106.02(9)(a) \$ DHS 106.02(9)(c) \$ DHS 106.02(9)(f) \$ DHS 106.02(9)(g) \$ DHS 106.03(2) \$ DHS 106.04(5)(a) \$ DHS 107.01 \$ DHS 108.02(9) \$ DHS 109.54		§ 49.45(2)(a)10 § 49.45(3)(f)

PROFESSIONAL FIND	OING: WRONG PROCEDURE	CODE		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The procedure code submitted for reimbursement is not supported by the documentation submitted by the provider.	A provider is required to use the applicable medical data code sets valid at the time the health care is furnished. The provider was reimbursed for code [xxx]. The documentation reflects the service performed is procedure code [xxx]. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.		45 C.F.R. § 162.1000 45 C.F.R. § 162.1002	§ 49.45(2)(a)10 § 49.45(3)(f)
The Evaluation and Management level procedure code submitted for reimbursement is not supported by the documentation submitted by the provider.	A provider is required to use the applicable medical data code sets valid at the time the health care is furnished. The provider was reimbursed for a level xx (new/established) patient Evaluation and Management service. The documentation reflects the level of the (new/established) patient Evaluation and Management service performed is xx. The reimbursement is adjusted to reflect the level of service documented. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 101.03(96m)(b) § DHS 106.03(2)(a) § DHS 107.01 § DHS 108.02(9)	45 C.F.R. § 162.1000 45 C.F.R. § 162.1002	§ 49.45(2)(a)10 § 49.45(3)(f)
PROFESSIONAL FIND	DING: INCOMPLETE DOCUM	ENTATION		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The initial physical examination and health history did not document the necessary components for reimbursement.	All family planning providers shall include specific components of the member's initial health history and physical exam. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 105.36(6) § DHS 106.02(9) § DHS 107.01 § DHS 107.21(1)(b) § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)

did not include an overview of available	Counseling services provided by family planning providers shall include the medical ramifications and effectiveness of available methods of contraception.  Without a proper Description of all the options, indications, and contraindications for each of those options it cannot be determined if the service selected was appropriate. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 106.02(9) § DHS 107.01 § DHS 107.21(1)(d)2 § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
PHARMACY FINDING	: INCOMPLETE DOCUMENT	TATION		D : 10/20/2024
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Revised 9/30/2021 Wisconsin State Statutes
There was no prescription provided for the claim.	A provider shall prepare and maintain truthful, accurate, complete, legible and concise documentation and medical and financial records. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 106.02(9)(g) § DHS 108.02(9) § DHS 109.54		§ 49.45(3)(f) § 49.46(2)(a)4.f § 450.11(2)
Prescription was not signed by a valid prescriber.	All prescription orders require a valid prescriber's authorization. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 107.01 § DHS 107.10(1) § DHS 108.02(9) § DHS 109.54		§ 49.45(2)(a)10 § 49.45(3)(f) § 450.11(1)
There was no documentation provided for this date of service showing this drug was dispensed.	A record of all prescriptions dispensed shall be maintained for a period of 5 years after the date of the last refill. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	\$ DHS 106.02(9)(a) \$ DHS 106.02(9)(b)7 \$ DHS 106.02(9)(b)8 \$ DHS 106.02(9)(e) \$ DHS 106.03(3)(a) \$ DHS 107.01 \$ DHS 107.10(1) \$ DHS 108.02(9) \$ DHS 109.31(6)		<u>§ 49.45(2)(a)10</u> <u>§ 49.45(3)(f)</u>

Prescription did not include [name, strength, quantity, date of issue, or directions for use] for prescribed item.	All prescription orders shall specify the date of issue, the name and address of the practitioner, the name and quantity of the drug product or device prescribed, directions for the use of the drug product or device, the symptom or purpose for which the drug is being prescribed if required, and, if the order is written by the practitioner, the signature of the practitioner. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 107.01 § DHS 107.10(1) § DHS 107.10(5)(b)(2) § DHS 108.02(9) § DHS 109.54		§ 49.45(2)(a)10 § 49.45(3)(f) § 450.11(1)
PROFESSIONAL FINE	DING: NON-COVERED SERVI	CES		
		XX//• •		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The services rendered were not directed or supervised by the appropriate professional.	All family planning services performed in family planning clinics must be prescribed by a prescriber, and furnished, directed or supervised by a prescriber, registered nurse, nurse practitioner, licensed practical nurse, or nurse midwife. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of	§ DHS 105.36(1)(b) § DHS 106.02(9) § DHS 106.03(2) § DHS 106.03(4) § DHS 107.01 § DHS 107.21 § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
	the services, or the accuracy of the claim.			

The documentation	The electronic signature must	© DHS 107.01		§ 49.45(2)(a)10
submitted does not meet	meet criteria needed to associate	© DHS 108.02(9)		§ 49.45(3)(f)
Electronic Health Record	the record to the intended person.	<u>y 19110-100.02(9)</u>		§ 137.11(8)
(EHR) signature	DHS was unable to verify the			
requirements.	actual provision of Medicaid-			§ 137.17
requirements.	covered services, the			
	appropriateness of the services, or			
	the accuracy of the claim. DHS			
	was unable to verify the actual			
	provision of Medicaid-covered			
	±			
	services, the appropriateness of			
	the services, or the accuracy of the			
	claim.			
The documentation in the	All providers shall prepare and	§ DHS 106.2(9)(b)		§ 49.45(2)(a)10
		• • • • • • • • • • • • • • • • • • • •		• • • • • • • • • • • • • • • • • • • •
member's medical record	maintain truthful, accurate,	§ DHS 107.01		§ 49.45(3)(f)
lacks required	complete, legible and concise	§ DHS 108.02(9)		
component(s) for	documentation. The provider			
reimbursement of an	failed to document the required			
office visit.	components for the CPT code			
	claimed. DHS was unable to			
	verify the actual provision of			
	Medicaid-covered services, the			
	appropriateness of the services, or			
	the accuracy of the claim.			
The provider and clinic	DHS was unable to verify the	§ DHS 105.36(2)(d)		§ 49.45(2)(a)10
shall not provide abortion	actual provision of Medicaid-	§ DHS 107.01		§ 49.45(3)(f)
as a method of family	covered services, the			<u>§ 49.43(3)(1)</u>
•	•	§ DHS 107.21		
planning	appropriateness of the services, or	§ DHS 108.02(9)		
	the accuracy of the claim.			
The provider did not	Informed consent is required.	§ DHS 107.01	C.F.R. § 50.204	§ 49.45(2)(a)10
obtain informed consent	DHS was unable to verify the	§ DHS 107.21(2)	C.F.R. § 441.257	§ 49.45(3)(f)
for a sterilization	actual provision of Medicaid-	§ DHS 108.02(9)		· · · / <del>· · /</del>
procedure from the	covered services, the	<del>\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ </del>		
member.	appropriateness of the services, or			
	the accuracy of the claim.			

PHARMACY FINDING	: NON-COVERED SERVICES			Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
Additions, alterations, or revisions made to the supporting documentation cannot be considered without proof that the original documentation existed at the time the service was rendered.	A provider shall prepare and maintain truthful, accurate, complete, legible and concise documentation and medical and financial records. The provider submitted documentation that appears altered. The services are non-covered. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 106.02(9)(a) § DHS 106.02(9)(e) § DHS 107.01 § DHS 108.02(9) § DHS 109.54		§ 49.45(2)(a)10 § 49.45(3)(f)
PROFESSIONAL FIND	ING: NOT MEDICALLY NEC	ESSARY		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The documentation provided does not support the necessity of service provided.	All providers must submit documentation showing the treatment of a condition is necessary for the diagnosis. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 101.03(96m)(b) § DHS 107.01 § DHS 107.03(5) § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
The documentation provided does not support the frequency of this test.	The documentation provided must support the medical necessity of the ordered service. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 101.03(96m)(b) § DHS 107.01 § DHS 107.03(5) § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)
PROFESSIONAL FIND	DING: INCORRECT MODIFIE	R		Revised 9/30/2021
Comment	Description	Wisconsin Administrative Code	Code of Federal Regulations	Wisconsin State Statutes
The provider used the wrong modifier to the procedure code for the service performed.	All providers shall prepare and maintain truthful, accurate, complete, legible and concise documentation. DHS was unable to verify the actual provision of Medicaid-covered services, the appropriateness of the services, or the accuracy of the claim.	§ DHS 106.02(9) § DHS 106.03(2) § DHS 107.01 § DHS 108.02(9)		§ 49.45(2)(a)10 § 49.45(3)(f)

or the [directions for use on the prescription OR quantity indicated on the orescription OR quantity equired for the claim].  The prescription of the orescription of the claim of the prescription of the claim of the orescription of the days' the prescription of the claim of the orescription of the claim of the orescription of the claim of the orescription of the claim of the ore or the orescription of t	nere are no directions for use on e prescription but there is a lantity indicated on the escription and the provider lled more than that quantity on e prescription.	Wisconsin Administrative Code  \$ DHS 106.02(9)(a)  \$ DHS 106.02(9)(e)  \$ DHS 106.04(5)(a)  \$ DHS 107.01  \$ DHS 109.54  \$ DHS 108.02(9)	Code of Federal Regulations	Wisconsin State Statutes  § 49.45(2)(a)10 § 49.45(3)(f) § 450.11(1)
or the [directions for use on the prescription OR quantity indicated on the orescription OR quantity equired for the claim].  The prescription of the orescription of the claim of the prescription of the claim of the orescription of the days' the prescription of the claim of the orescription of the claim of the orescription of the claim of the orescription of the claim of the ore or the orescription of t	ug that is greater than the rections for use indicated on the escription.  R here are no directions for use on a prescription but there is a faintity indicated on the escription and the provider led more than that quantity on a prescription.  R ovider billed for a quantity of a drug in excess of the quantity quired for the days' supply on a claim.  HS was unable to verify the tual provision of Medicaid-	§ DHS 106.02(9)(e) § DHS 106.04(5)(a) § DHS 107.01 § DHS 109.54		§ 49.45(3)(f)
o the [directions for use on the prescription OR quantity indicated on the orescription OR quantity the equired for the days' the upply on the claim].  The ore contains the ore contains the contains t	rections for use indicated on the escription.  R here are no directions for use on the prescription but there is a mantity indicated on the escription and the provider alled more than that quantity on the prescription.  R  ovider billed for a quantity of the drug in excess of the quantity quired for the days' supply on the claim.  HS was unable to verify the trual provision of Medicaid-	§ DHS 106.04(5)(a) § DHS 107.01 § DHS 109.54		
on the prescription OR quantity indicated on the prescription OR quantity apply on the claim].  The prescription OR quantity apply on the claim].  Prescription OR quantity apply on the claim].  DIFFERENCE OF Prescription OR quantity apply on the claim apply on	escription.  R here are no directions for use on the prescription but there is a stantity indicated on the escription and the provider filled more than that quantity on the prescription.  R ovider billed for a quantity of the drug in excess of the quantity quired for the days' supply on the claim.  HS was unable to verify the trual provision of Medicaid-	© DHS 107.01 © DHS 109.54		§ 450.11(1)
prescription OR quantity required for the days' upply on the claim].  The prescription OR quantity the quantity prescription of the days' upply on the claim].  DIFFERENCE OR THE PROPERTY OF	Representation of the directions for use on the prescription but there is a plantity indicated on the escription and the provider deled more than that quantity on the prescription.  Representation of the quantity of the drug in excess of the quantity quired for the days' supply on the claim.  HS was unable to verify the trual provision of Medicaid-	<u>§ DHS 109.54</u>		
rescription OR quantity equired for the days' upply on the claim].  pre bill the OF Pro the req the DI act cov	nere are no directions for use on a prescription but there is a mantity indicated on the escription and the provider led more than that quantity on a prescription.  R ovider billed for a quantity of a drug in excess of the quantity quired for the days' supply on a claim.  HS was unable to verify the tual provision of Medicaid-	<u>§ DHS 109.54</u>		
equired for the days' the upply on the claim]. quapre bill the OF Prother the required the DF act covapp	e prescription but there is a cantity indicated on the escription and the provider led more than that quantity on e prescription.  R ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-	3		
upply on the claim]. quapre bill the OF Prother the requirements of the coverage approximately appro	antity indicated on the escription and the provider led more than that quantity on e prescription.  R  ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
prebill the OF Pro the req the	escription and the provider led more than that quantity on e prescription.  R ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
bill the OF Pro the req the  DF act cov	lled more than that quantity on e prescription.  R ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
the OF Pro the req the DF act cov app	e prescription.  R  ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
OF Prother the req the DF act cov	R ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
Pro the req the DF act cov app	ovider billed for a quantity of e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
the required the r	e drug in excess of the quantity quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
req the DI act cov app	quired for the days' supply on e claim.  HS was unable to verify the tual provision of Medicaid-			
the DF act cov app	e claim.  HS was unable to verify the tual provision of Medicaid-			
DF act cov app	HS was unable to verify the tual provision of Medicaid-			
act cov app	tual provision of Medicaid-			
act cov app	tual provision of Medicaid-			
cov app	*			
app	VEIEU SCIVICES, LIC			
	propriateness of the services, or			
<b>—</b>	e accuracy of the claim.			
PHARMACY FINDING: O	THER (included as 'OTHER	R' since it's only used in F	P audits)	
		Wisconsin	Code of Federal	Revised 9/30/20 Wisconsin Stat
Comment	Description	Administrative Code	Regulations	Statutes
Ouplicative billing. The Tw	wo different drugs used for	§ DHS 101.03(96m)	8	§ 49.45(2)(a)10
1	entical purposes dispensed	© DHS 106.02(9)(a)		§ 49.45(3)(f)
	nultaneously (i.e. Plan B and	§ DHS 106.02(9)(g)		§ <del>17.13(3)(1)</del>
	la dispensed together).	( ) (0)		
eccosity requirements.	la dispensed together).	§ DHS 107.01		
DF	HS was unable to verify the	§ DHS 107.03(5)		
	tual provision of Medicaid-	§ DHS 108.02(9)		
	vered services, the	§ DHS 109.54		
	propriateness of the services, or			
	e accuracy of the claim.			