

Medicare Claim Review Programs: MR, NCCI Edits, MUEs, CERT, and RAC



Background

Since 1996, the Centers for Medicare & Medicaid Services (CMS) has implemented several initiatives to prevent improper payments before a claim is processed and also, to identify and recoup improper payments after the claim is processed. The overall goal of CMS' claim review programs is to reduce payment error by identifying and addressing billing errors concerning coverage and coding made by providers. The *Improper Medicare Fee-For-Service Payments Report – November 2009*, shows that 7.8 percent of the Medicare dollars paid did not comply with one or more Medicare coverage, coding, billing, or payment rules. This equates to \$24.1 billion in Medicare overpayments and underpayments annually. This report can be reviewed at http://www.cms.gov/apps/er_report/edit_report_1.asp on the CMS website.

CMS employs a variety of contractors to process claims submitted by physicians, hospitals, and other health care providers/suppliers and make payment to those providers in accordance with the Medicare rules and regulations. These organizations, called Carriers, Fiscal Intermediaries (FIs), and Medicare Administrative Contractors (MACs)¹, are also referred to as Medicare claims processing contractors. CMS employs Program Safeguard Contractors (PSCs)² and Zone Program Integrity Contractors (ZPICs), which are responsible for identifying cases of suspected fraud and taking appropriate corrective actions. In addition, CMS employs Recovery Audit Contractors (RACs) to identify and correct underpayments and overpayments on a postpayment basis. The Comprehensive Error Rate Testing (CERT) contractor performs reviews on a small sample of Medicare Fee-For-Service (FFS) claims to produce an annual error rate.

This booklet describes the following five claim review programs and their role in the life cycle of Medicare claims processing. The columns on the table below divide the programs based on performance of prepayment or postpayment reviews.

Table 1. Medicare Prepayment and Postpayment Claim Review Programs

| Prepayment Claim Review Programs | Postpayment Claim Review Programs |
|--|---|
| National Correct Coding Initiatives (NCCI) Edits | Comprehensive Error Rate Testing (CERT) Program |
| Medically Unlikely Edits (MUEs) | Recovery Audit Contractor (RAC) |
| Carrier/FI/MAC Medical Review (MR) | Carrier/FI/MAC Medical Review (MR) |

¹Medicare Contracting Reform (MCR) Update – In Section 911 of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (MMA) Congress mandated that the Secretary of the Department of Health and Human Services replace the current contracting authority under Title XVIII of the Social Security Act with the new Medicare Administrative Contractor (MAC) authority. This mandate is referred to as Medicare Contracting Reform. Medicare Contracting Reform is intended to improve Medicare's administrative services to beneficiaries and health care providers. All Medicare work performed by Fiscal Intermediaries and Carriers will be replaced by the new A/B MACs by 2011. Providers may access the most current MCR information to determine the impact of these changes and to view the list of current MACs for each jurisdiction at <http://www.cms.gov/MedicareContractingReform> on the CMS website.

²Currently, Durable Medical Equipment (DME) PSCs perform medical review of DME claims. In the near future this function will be transferred to the DME MACs. The DME PSCs will be transitioned into ZPICs.

The first two programs (NCCI Edits and MUEs) review claims **before** they are paid (called prepayment review). The second two programs (CERT and RAC) review claims **after** they are paid (called postpayment review). The MR program can perform both prepayment and postpayment reviews. A table at the end of this booklet summarizes the five programs and how they proactively identify potential billing errors concerning coverage and coding.

National Correct Coding Initiatives (NCCI) Edits

Performed by: Medicare Claims Processing Contractors

CMS developed the NCCI to promote national correct coding methodologies and to control improper coding that leads to inappropriate payment in Medicare Part B claims. The coding policies are based on coding conventions defined in the American Medical Association's (AMA's) Current Procedural Terminology (CPT) Manual, Healthcare Common Procedure Coding System (HCPCS) Manual, national and local Medicare policies and edits, coding guidelines developed by national societies, standard medical and surgical practice, and/or current coding practice. NCCI edits are updated quarterly.

NCCI Edits Process

The NCCI edits are automated prepayment edits. This means that as the submitted claim is processed by the Medicare claims processing contractor's systems, the submitted procedures are analyzed to determine if they comply with the NCCI edit policy. Processing systems test every pair of codes reported for the same date of service for the same beneficiary by the same provider against the NCCI edit tables. If a pair of codes hits against an NCCI edit, the column two code of the edit pair is denied unless it is submitted with an NCCI associated modifier and the edit allows such modifiers.

HCPCS/CPT codes representing services denied based on NCCI edits may not be billed to Medicare beneficiaries. Since these denials are based on incorrect coding rather than medical necessity, the provider cannot utilize an "Advanced Beneficiary Notice of Noncoverage" form to seek payment from a Medicare beneficiary. Furthermore, since the denials are based on incorrect coding rather than a legislated Medicare benefit exclusion, the provider cannot seek payment from the beneficiary with or without a "Notice of Exclusions from Medicare Benefits" form.

Note: Outpatient Code Editor (OCE) edits differ from the NCCI edits. The OCE edits and the NCCI edits are two editing systems used to process FI and Carrier-related claims, respectively. The NCCI edits are developed based on coding conventions defined in the AMA's CPT Manual, current standards of medical and surgical coding practice, input from specialty societies, and based on analysis of current coding practice. The NCCI edits are used for Carrier processing of physician services under the Medicare Physician Fee Schedule (PFS) while the OCE edits are used by FIs for processing hospital outpatient services under the Hospital Outpatient Prospective Payment System (OPPS). The OCE is used in processing OPPS claims. A number of the NCCI edits are included in the OCE edits. The OCE edits are used exclusively under the hospital OPPS – they are not used within the Medicare PFS.

Additional NCCI Resources

NCCI Edits Overview Web Page (including NCCI FAQs)

<http://www.cms.gov/NationalCorrectCodInitEd>

Claims Processing Manual Chapter 23 - Section 20.9

<http://www.cms.gov/manuals/downloads/clm104c23.pdf>

Providers/suppliers who have concerns regarding specific NCCI edits can submit comments in writing to:

National Correct Coding Initiative

Correct Coding Solutions LLC

P.O. Box 907

Carmel, IN 46082-0907

Attention: Niles R. Rosen, M.D., Medical Director and Linda S. Dietz, RHIA, CCS, CCS-P,
Coding Specialist

Fax #: 317-571-1745

The *CCI Edits Manual* may be obtained by purchasing the manual, or sections of the manual, from the National Technical Information Service (NTIS) website at <http://www.ntis.gov/products/cci.aspx> on the Internet, or by contacting NTIS at 1-800-363-2068 or 703-605-6060.

Medically Unlikely Edits (MUEs)

Performed by: Medicare Claims Processing Contractors

To lower the Medicare FFS paid claims error rate, CMS established units of service edits for Medicare Part B benefit claims, referred to as MUEs. Just like the NCCI edit, the MUE edit is an automated prepayment edit that helps prevent inappropriate payments. As the submitted claim is processed by the Medicare claims processing contractor's systems, the submitted procedures are analyzed to determine if they comply with the MUE policy. An MUE for a HCPCS/CPT code is the maximum units of service under most circumstances that a provider would report for a code for a single beneficiary on a single date of service. MUEs are not meant to establish Medicare payment policy, but rather to improve the accuracy of Medicare payments. MUEs do not exist for all HCPCS/CPT codes.

CMS develops MUEs based on anatomic considerations, HCPCS/CPT code descriptors, CPT coding instructions, established CMS policies, nature of service/procedure, nature of an analyte, nature of equipment, and clinical judgment. All MUEs are validated against 100 percent claims data from a six-month period. Prior to implementation of MUEs, national health care organizations are offered an opportunity to review and comment about proposed edits. The MUEs do not require that Medicare contractors perform manual review or suspend claims. The MUEs only apply to the services specifically listed in the table of MUEs; thus all services will not have MUEs associated with them.

In January 2007, CMS implemented the first MUEs for approximately 2,800 HCPCS/CPT codes based on anatomic considerations. On October 1, 2008, the majority of existing MUEs were made public and posted on the CMS website. CMS will not publish all MUE values because of fraud and abuse concerns.

Providers should not interpret MUE values as utilization guidelines. MUE values do not represent units of service that may be reported without concern about medical review. Providers should continue to report only services that are medically reasonable and necessary.

MUEs Process

Claim lines that pass the MUE edits continue to be processed. Those claim lines that report units of service greater than the MUE value for the HCPCS code on the claim line are denied. A claim line denial due to an MUE may be appealed. Providers may request modification of an MUE value by contacting the NCCI contractor. See the answer to Question #8 in Table 2 (MUEs FAQs).

Table 2. MUEs Frequently Asked Questions (FAQs)

| Question | Answer |
|--|---|
| 1. What is the CMS MUE program? | The CMS MUE program was developed to reduce the paid claims error rate for Medicare claims. MUEs are designed to reduce errors due to clerical entries and incorrect coding based on anatomic considerations, HCPCS/CPT code descriptors, CPT coding instructions, established CMS policies, nature of a service/procedure, nature of an analyte, nature of equipment, and unlikely clinical treatment. |
| 2. What is an MUE? | An MUE is a unit of service (UOS) edit for a HCPCS/CPT code for services rendered by a single provider/supplier to a single beneficiary on the same date of service. The ideal MUE is the maximum UOS that would be reported for a HCPCS/CPT code on the vast majority of appropriately reported claims. The MUE program provides a method to report medically reasonable and necessary UOS in excess of an MUE. See answer to Question #4. |
| 3. How are claims adjudicated with MUEs? | <p>All CMS claims processing contractors adjudicate MUEs against each line of a claim rather than the entire claim. Thus, if a HCPCS/CPT code is reported on more than one line of a claim by using CPT modifiers, each line with that code is separately adjudicated against the MUE.</p> <p>Effective April 1, 2010, FIs and A/B MACs processing claims with the Fiscal Intermediary Shared System (FISS) deny the entire claim line if the units of service on the claim line exceed the MUE value for the HCPCS/CPT code on the claim line. Since claim lines are denied, the denial may be appealed. Prior to April 1, 2010 claims with units of service exceeding the MUE value for the HCPCS/CPT code on a claim line were returned to the provider. Since these claims were not denied, no appeal was applicable.</p> <p>(See answer to Question #4 for guidance on reporting medically reasonable and necessary services in excess of an MUE.)</p> <p>DMACs processing claims with the VMS system deny the entire claim line if the units of service on the claim line exceed the MUE for the HCPCS/CPT code on the claim line. Since claim lines are denied, the denial may be appealed.</p> |

| Question | Answer |
|---|--|
| 4. How do I report medically reasonable and necessary units of service in excess of an MUE? | <p>Since each line of a claim is adjudicated separately against the MUE of the code on that line, the appropriate use of CPT modifiers to report the same code on separate lines of a claim will enable a provider/supplier to report medically reasonable and necessary units of service in excess of an MUE. CPT modifiers such as -76 (repeat procedure by same physician), -77 (repeat procedure by another physician), anatomic modifiers (e.g., RT, LT, F1, F2), -91 (repeat clinical diagnostic laboratory test), and -59 (distinct procedural service) will accomplish this purpose. Modifier -59 should be utilized only if no other modifier describes the service.</p> |
| 5. Is there an appeal process for claim lines denied based on MUEs? | <p>Since claim lines are denied at Carriers and A/B MACs processing claims with the MCS system and at DMACs processing claims with the VMS system, MUE-based claim line denials at these contractors may be appealed.</p> <p>Effective April 1, 2010, FIs and A/B MACs processing claims with the FISS system deny claim lines with units of service exceeding the MUE value for the HCPCS/CPT code on the claim line. MUE based claim line denials may be appealed. Prior to April 1, 2010, claims processed by FISS were returned to the provider rather than denied, and no appeal process was applicable. Appeals should be submitted to local contractors, not the MUE contractor, Correct Coding Solutions, LLC.</p> |
| 6. How are claim lines adjudicated against an MUE for a repetitive service reported on a single claim line? | <p>Some contractors allow providers to report repetitive services performed over a range of dates on a single line of a claim with multiple units of service. If a provider reports services in this fashion, the provider should report the “from date” and “to date” on the claim line. Contractors are instructed to divide the units of service reported on the claim line by the number of days in the date span and round to the nearest whole number. This number is compared to the MUE for the code on the claim line.</p> |
| 7. How were MUEs developed? | <p>MUEs were developed based on HCPCS/CPT code descriptors, CPT coding instructions, anatomic considerations, established CMS policies, nature of service/procedure, nature of an analyte, nature of equipment, and clinical judgment. All edits based on clinical judgment as well as many others were reviewed by workgroups of contractor medical directors.</p> <p>Prior to implementation of MUEs, the proposed edits were released for a review and comment period to the AMA, national medical/surgical societies, and other national health care organizations, including non-physician professional societies, hospital organizations, laboratory organizations, and durable medical equipment organizations.</p> |

| Question | Answer |
|--|--|
| <p>8. How do I request a change in the MUE value for a HCPCS/CPT code?</p> | <p>If a provider/supplier, health care organization, or other interested party believes that an MUE value should be modified, it may write Correct Coding Solutions, LLC at the address below. The party should include its rationale and any supporting documentation. However, it is commonly recommended that the party contact the national health care organization whose members perform the procedure prior to writing to Correct Coding Solutions, LLC. The national health care organization may be able to clarify the reporting of the code in question. If the national health care organization agrees that the MUE level should be modified, its support and assistance may be helpful in requesting the modification of an MUE level.</p> <p>Requests for modification of an MUE level should be sent to the following:</p> <p style="padding-left: 40px;">National Correct Coding Initiative Correct Coding Solutions, LLC P.O. Box 907 Carmel, IN 46082-0907 FAX: 317-571-1745</p> <p>Some MUEs were modified in 2008 based on data refinement. The data refinement resulted in some MUE values being increased and others being decreased.</p> |
| <p>9. How do I make an inquiry about the MUE program other than about MUE levels for specific HCPCS/CPT codes?</p> | <p>Inquiries about the MUE program other than those related to MUE values for specific HCPCS/CPT codes should be sent to the following: Valeria Allen (valeria.allen@cms.hhs.com)</p> |
| <p>10. Has CMS published the MUE levels for HCPCS/CPT codes?</p> | <p>CMS publishes most MUE values on its website. However, CMS does not publish MUE values for some codes. The MUE values for this latter group of codes are confidential information that should not be published by third parties who have acquired them.</p> <p>MUE values are not utilization guidelines. Providers may be subject to a review of their claims by claims processing contractors, PSCs, or RACs even if they report units of service less than or equal to the MUE value for a HCPCS code.</p> |
| <p>11. Will CMS implement MUEs for additional HCPCS/CPT codes?</p> | <p>CMS began implementation of MUEs for HCPCS/CPT codes on January 1, 2007. There are quarterly updates to the MUE files that include MUEs for additional codes. Although most HCPCS/CPT codes will have MUEs, some groups of codes have been temporarily excluded for future consideration.</p> |

Additional MUE Resources

CR 6712– Medically Unlikely Edits (MUEs)

<http://www.cms.gov/transmittals/downloads/R652OTN.pdf>

CCI Edits: Medically Unlikely Edits (MUEs)

http://www.cms.gov/NationalCorrectCodInitEd/08_MUE.asp

Quarterly Update to Medically Unlikely Edits (MUEs), Version 14, Effective January 1, 2008 (CR 5824)

<http://www.cms.gov/transmittals/downloads/R1386CP.pdf>

Carrier/FI/MAC MR Program

Performed by: Medicare Claims Processing Contractors

Through error rates produced by the CERT Program, vulnerabilities identified through the RAC Program, analysis of claims data, and evaluation of other information (e.g., complaints), suspected billing problems are identified by Medicare claims processing contractors. MR activities are targeted at identified problem areas appropriate for the severity of the problem.

If the Medicare claims processing contractor verifies that an error exists through a review of a small sample of claims, the contractor classifies the severity of the problem as minor, moderate, or significant and imposes corrective actions that are appropriate for the severity of the infraction. The following types of corrective actions can result from MR:

- **Provider Notification/Feedback** – Problems detected at minor, moderate, or significant levels will require the contractor to inform the provider of appropriate billing procedures.
- **Prepayment review** – Prepayment review consists of MR of a claim prior to payment. Providers with identified problems submitting correct claims may be placed on prepayment review, in which a percentage of their claims are subjected to MR before payment can be authorized. Once providers have re-established the practice of billing correctly, they are removed from prepayment review.
- **Postpayment review** – Postpayment review involves MR of a claim after payment has been made. Postpayment review is commonly performed by using Statistically Valid Sampling. Sampling allows an underpayment or overpayment (if one exists) to be estimated without requesting all records on all claims from providers. This reduces the administrative burden for Medicare and costs for both Medicare and providers.

To help prevent improper payments, education for providers submitting claims is provided by the Provider Outreach and Education (POE) department.

Both prepayment and postpayment reviews may require providers to submit medical records. When medical records are requested, the provider must submit them within the specified timeframe or the claim will be denied.

Note: Effective August 1, 2008, Quality Improvement Organizations (QIOs) are no longer performing the MR for payment of acute inpatient prospective payment system hospital and long-term care hospital claims submitted after December 31, 2007. These reviews

are the responsibility of the A/B MACs or FIs. QIOs will continue to perform provider-requested higher-weighted Diagnosis Related Group reviews.

Additional Medical Review Resource

Medicare Program Integrity Manual

<http://www.cms.gov/Manuals/IOM/list.asp>

Comprehensive Error Rate Testing (CERT) Program

Performed by: CERT Review Contractor (CERT RC) and CERT Documentation Contractor (CERT DC)

CMS uses the CERT Program to produce a national Medicare FFS error rate as required by the Improper Payments Elimination and Recovery Act. CERT randomly selects a small sample of Medicare FFS claims. CERT then reviews the claims and medical records from providers/suppliers who submitted them, and then reviews the claims for compliance with Medicare coverage, coding, and billing rules. In 2009, the CERT contractor randomly sampled 99,500 claims from Medicare claims processing contractors during a one-year period. This process was designed to pull a blind sample of claims each day from all of the claims providers submitted that day.

When performing these reviews, the CERT contractor follows Medicare regulations, billing instructions, National Coverage Determinations (NCDs), coverage provisions in interpretive manuals, and the respective Medicare claims processing contractor's Local Coverage Determinations (LCDs). The CERT contractor does not develop or apply its own coverage, payment, or billing policies. To better gain insight into the causes of errors, CMS calculates not only a national Medicare FFS paid claims error rate but also service specific and provider type error rates and a provider compliance error rate. The results of the reviews are published in an annual report (and semi-annual updates).

Paid Claims Error Rate

This rate is based on dollars paid after the Medicare contractor made its payment decision on the claim. This rate includes fully denied claims for FFS claims. The paid claims error rate is the percentage of total dollars that all Medicare FFS contractors erroneously paid or denied and is a good indicator of how claim errors in the Medicare FFS Program impact the trust fund. CMS calculates the gross rate by adding underpayments to overpayments and dividing that sum by total dollars paid.

Provider Compliance Error Rate

This rate is based on how the claims looked when they first arrived at the Medicare claims processing contractor before the contractor applied any edits or conducted any reviews. The provider compliance error rate is a good indicator of how well the contractor is educating the provider community since it measures how well providers prepared claims for submission. CMS does not collect covered charge data from provider facilities that submit claims to FIs or A/B MACs; therefore, current facility data is insufficient for calculating a provider compliance error rate.

Other Error Rates

The CERT report may also describe other error rates to provide the most specific information available to target problem areas. Other error rates include error rates by service type and by provider type. In addition, based on Executive Order 13520, Reducing Improper Payments and Eliminating Waste in Federal Programs, CERT has initiated four supplemental measures that will be reported annually, Power Mobility Devices (PMDs), Chiropractic Services, Pressure Reducing Support Surfaces, and Short Hospital Stays.

CERT Process

The CERT post-pay medical review process begins at the Medicare claims processing contractors. After the claims have been processed, samples of the claims are selected for CERT review. The CERT then uses information from the claims processing contractors to request documentation from the provider/supplier who submitted the sampled claim. The claim and the supporting documentation are reviewed by CERT Program clinicians who determine whether the claim was submitted and paid appropriately. The CERT Program collects additional information from the contractor for each claim considered to be in error via a feedback process.

Due to the sampling methodology, a small percentage of providers would be subject to CERT review. However, provider claims that are selected for CERT review are subject to potential post-pay payment denials, payment adjustments, or other administrative or legal actions depending upon the result of the review. Claims can be adjusted or denied based on the CERT review and normal appeals rights and processes do apply.

Additional CERT Resources

CERT Overview Web Page

http://www.cms.gov/CERT/01_overview.asp

CERT Reports Web Page

<http://www.cms.gov/CERT/CR/list.asp>

Recovery Audit Contractor (RAC)

Performed by: Medicare FFS RAC Contractors

Section 306 of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (MMA) required CMS to complete a three-year demonstration program to determine whether the use of RACs is a cost-effective means of identifying and correcting Medicare overpayments and underpayments in the Medicare FFS Program. This demonstration program began in March 2005 with jurisdictions in California, Florida, and New York because they are the largest states in terms of Medicare utilization. In the summer of 2007, the demonstration program was expanded to three more states to include Massachusetts, South Carolina, and Arizona. The RAC demonstration program ended in March 2008.

In December 2006, the Tax Relief and Health Care Act of 2006 made the RAC Program permanent and authorized the expansion of the program nationwide by January 1, 2010. Contracts for all RAC

regions were awarded in October 2008 but protests of the awards delayed actual execution of the contracts until February 2009. The latest information about the permanent RAC Program can be found at <http://www.cms.gov/RAC> on the CMS website.

In March 2010, Congress again expanded the role of recovery audit contracting in the Affordable Care Act. Section 6411 of the Affordable Care Act expands the RAC Program to Medicaid and Medicare Parts C and D. This change requires all states to establish individual Medicaid RAC Programs under their State plan or waiver. In addition, the Affordable Care Act provision requires these RACs to also serve in a program integrity capacity, reviewing each Medicare Advantage and Part D plan's anti-fraud plan.

RAC Process

Currently, the Medicare RACs are tasked with detecting and correcting improper payments on Medicare FFS claims (i.e., collecting overpayments and paying back underpayments). During FY 2007, CMS gave each demonstration RAC all the claims for their jurisdiction that had been paid by Medicare claims processing contractors between October 1, 2002 and September 30, 2006.

RACs apply statutes, regulations, CMS national coverage, payment, and billing policies, as well as LCDs that have been developed by the Medicare claim processing contractors. RACs do not develop or apply their own coverage, payment, or billing policies.

In general, RACs will not review a claim that has previously been reviewed by another entity. RACs analyze claims data using their proprietary software, and identify claims that contain improper payments and those that likely contain improper payments. If a RAC finds an improper payment, the RAC sends a file to the claims processing contractor to adjust the claim and payment are recouped. In the case of claims that contain likely improper payments, the RAC requests the medical record from the provider, reviews the claim and medical record, and then makes a determination as to whether the claim contains an overpayment, an underpayment, or a correct payment.

If a denial or adjustment is indicated by the review of records, providers will receive overpayment/underpayment notification letters. Providers can appeal denials (including no documentation denials) following the normal appeal processes by submitting documentation supporting their claims.

Additional RAC Resources

RAC Overview Web Page

http://www.cms.gov/RAC/01_Overview.asp

RAC Demonstration Web Page

http://www.cms.gov/RAC/02_ExpansionStrategy.asp

RAC Jurisdiction Contact Information

<http://www.cms.gov/RAC/Downloads/RAC%20contact%20information.pdf>

Recent Updates

http://www.cms.gov/RAC/03_RecentUpdates.asp

Table 3. Summary of MR, NCCI Edits, MUE, CERT, and RAC

| | NCCI | MUE | Carrier/FI/ MAC Medical Review | CERT | RAC |
|--|--|--|--|---|---|
| Providers Impacted | Providers who submit claims for Part B services using HCPCS/ CPT codes | Providers/ suppliers who submit claims for Part B services using HCPCS/ CPT codes | Providers who submit FFS claims | Providers who submit FFS claims | Providers who submit FFS claims |
| Medicare Contractor | NCCI Contractor (develops the edits) Medicare claims processing contractor operates the edits | NCCI Contractor (develops the edits) Medicare claims processing contractor operates the edits | Carriers Fiscal Intermediaries Medicare Administrative Contractors | CERT Review Contractor (CERT RC) CERT Documentation Contractor (CERT DC) | Medicare RAC Contractors |
| Claims Impacted | All Part B practitioner, ASC, and hospital OPPS claims screened | All Part B practitioner, ASC, outpatient hospital and therapy claims screened | Targeted claim review – number varies by Contractor’s Medical Review strategy | Limited random claim sample – historically <150,000 nationally/year | Widespread or targeted claim review – number varies by RAC’s audit strategy |
| Prepayment Edit | Yes – tables updated quarterly | Yes – tables updated quarterly | Yes | No | No |
| Postpayment Medical Record Review | No | No | Yes | Yes | No – if clear payment error Yes – if likely payment error |

Table 3. Summary of MR, NCCI Edits, MUE, CERT, and RAC (continued)

| | NCCI | MUE | Carrier/FI/ MAC Medical Review | CERT | RAC |
|---|-------------|------------|--|---|--|
| Provider Response to Audit Request | N/A | N/A | Providers must submit medical records to the Carrier/FI/MAC within 30 days from the receipt date of the initial letter | Providers must submit medical records to the CERT DC within 30 days from the receipt date of the initial letter | Providers must submit medical records to the RAC (or request an extension) within 45 days from the date of the initial letter requesting medical records |
| Right to Appeal | Yes | Yes | Yes – using traditional appeals processes | Yes – using traditional appeals processes | Yes – using traditional appeals processes |



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