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22 **IN THE UNITED STATES DISTRICT COURT**  
23 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

24 UNITED STATES OF AMERICA, *ex rel.* )  
25 RONDA OSINEK, )  
26 )  
27 Plaintiffs, )

28 v. )

29 KAISER PERMANENTE, et al., )  
30 )  
31 Defendants. )

Case No. 3:13-c-v-03891-EMC  
(Consolidated)

32 \_\_\_\_\_ )  
33 UNITED STATES OF AMERICA, *ex rel.* )  
34 GLORYANNE BRYANT and )  
35 VICTORIA M. HERNANDEZ, )

36 Plaintiffs-Relators, )

37 v. )

Case No. 3:18-cv-01347-EMC

1 KAISER FOUNDATION HEALTH PLAN, ) INC., KAISER FOUNDATION ) 2 HOSPITALS, THE PERMANENTE ) MEDICAL GROUP, INC., SOUTHERN ) 3 CALIFORNIA PERMANENTE MEDICAL ) GROUP, COLORADO PERMANENTE ) 4 MEDICAL GROUP, P.C., THE ) SOUTHEAST PERMANENTE MEDICAL ) 5 GROUP, INC., HAWAII PERMANENTE ) MEDICAL GROUP, INC., MID-ATLANTIC ) 6 PERMANENTE MEDICAL GROUP, P.C., ) NORTHWEST PERMANENTE, P.C., ) 7 WASHINGTON PERMANENTE MEDICAL ) GROUP, P.C., KAISER FOUNDATION ) 8 HEALTH PLAN OF COLORADO, KAISER ) FOUNDATION HEALTH PLAN OF ) 9 GEORGIA, INC., KAISER FOUNDATION ) HEALTH PLAN OF THE MID-ATLANTIC ) 10 STATES, INC., KAISER FOUNDATION ) HEALTH PLAN OF THE NORTHWEST, ) 11 and KAISER FOUNDATION HEALTH ) PLAN OF WASHINGTON, ) 12 ) 13 ) Defendants. )	AMENDED COMPLAINT BY RELATORS GLORYANNE BRYANT AND VICTORIA M. HERNANDEZ FOR VIOLATIONS OF FEDERAL FALSE CLAIMS ACT  DEMAND FOR JURY TRIAL
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14 COMES NOW, Plaintiffs and *Qui Tam* Relators Gloryanne Bryant ("Ms. Bryant") and  
 15 Victoria M. Hernandez ("Ms. Hernandez," and together with Ms. Bryant, "Relators"), individually  
 16 and on behalf of the United States of America, to recover treble damages and civil penalties under  
 17 the federal False Claims Act ("FCA"), 31 U.S.C. §§ 3729-3733, for monies unlawfully obtained  
 18 and/or retained from the federal Medicare Program by Defendant Kaiser Foundation Health Plan,  
 19 Inc. and various of its direct and indirect subsidiaries and affiliates (together, "Kaiser" or the "Kaiser  
 20 Defendants"), and allege as follows:

21 **INTRODUCTION**

22 The Kaiser Defendants are now and have been, in some cases since at least 2009,  
 23 engaged in a widespread scheme to knowingly submit, or cause to be submitted, false claims for  
 24 payment to the United States by submitting false "risk adjustment" information to the Centers for  
 25 Medicare & Medicaid Services ("CMS") in order to improperly increase the amounts CMS pays  
 26 them. Likewise, the Kaiser Defendants have knowingly retained overpayments received from CMS  
 27 as a result of their false risk adjustment submissions.

1           1.       Millions of elderly and disabled individuals throughout the United States  
2 receive their Medicare benefits through the Medicare Advantage Program (also referred to as  
3 "Medicare Part C"). A central, distinguishing feature of the Medicare Advantage Program is the  
4 provision of Medicare benefits by private healthcare insurance organizations. Medicare  
5 beneficiaries enroll in managed healthcare insurance plans called Medicare Advantage Plans ("MA  
6 Plans") that are owned and operated by these private organizations, called Medicare Advantage  
7 Organizations ("MA Organizations"). This case involves, in large part, conduct by Kaiser — which  
8 operates one of the nation's largest MA Organizations — to improperly obtain or avoid returning  
9 payments under the Medicare Advantage Program that it was not entitled to receive.

10           2.       The Government pays each MA Organization a fixed monthly payment for  
11 each Medicare beneficiary enrolled in its plans. The Government adjusts these payments for various  
12 risk factors that affect expected healthcare expenditures, including the health status of each enrollee.  
13 The adjustments are intended to ensure that MA Organizations are paid more for those enrollees  
14 expected to incur higher healthcare costs and less for healthier enrollees expected to incur lower  
15 costs.

16           3.       To obtain payments based on adjustments for health status, MA  
17 Organizations submit diagnosis codes to the Government for the beneficiaries in their MA Plans.  
18 These diagnosis codes are from the beneficiaries' medical encounters (*e.g.*, office and hospital  
19 visits). Using these diagnosis codes, the Government calculates a risk score for each beneficiary.  
20 The beneficiary's risk score is then used to calculate monthly payments to the MA Organization for  
21 that beneficiary for the following year. In general, the more numerous the conditions diagnosed, and  
22 the more severe the conditions, the higher the risk score for a beneficiary and, thus, the greater the  
23 risk-adjusted payments made to the MA Organization for that beneficiary.

24           4.       This payment model creates powerful incentives for MA Organizations to  
25 over-report diagnosis codes in order to exaggerate the expected healthcare costs for their enrollees.  
26 In order to combat these incentives and protect the Government from making erroneous payments  
27 to MA Organizations, the Government requires that submitted diagnoses be supported and validated  
28

1 by the beneficiaries' medical records. It is a well-established requirement that all diagnosis codes  
2 submitted to the Medicare Program for risk adjustment payments must be unambiguously supported  
3 by clinical documentation included in the beneficiaries' medical records. Kaiser knew that these  
4 medical records are the "source of truth" for the purpose of receiving and retaining risk adjustment  
5 payments, and for each individual member's medical history and clinical profile.

6           5. In addition, each MA Organization must expressly certify in "Risk  
7 Adjustment Attestations" submitted to CMS that the diagnosis codes it has provided are accurate  
8 and truthful. 42 C.F.R. § 422.504(1)(2). Each MA Organization must also "[a]dopt and implement  
9 an effective compliance program, which must include measures that prevent, detect, and correct  
10 non-compliance with [the Government's] program requirements as well as measures that prevent,  
11 detect, and correct fraud, waste, and abuse." 42 C.F.R. § 422.503(b)(4)(vi).

12           6. In excess of one million elderly and disabled Medicare beneficiaries are  
13 currently enrolled in MA Plans that are owned and operated by Kaiser throughout the United States,  
14 and that number is growing. In 2011, approximately one million Medicare beneficiaries in the  
15 United States were enrolled in Kaiser's MA Plans. In 2015, Kaiser's MA Plans had grown to 1.3  
16 million beneficiaries, in 2016 to 1.4 million, and in 2021 to 1.7 million.

17           7. The United States also contributes to premiums paid by individuals to private  
18 health insurance companies, including Kaiser, under the Affordable Care Act (sometimes referred  
19 to as the "ACA"). The Affordable Care Act authorizes the Department of Health and Human  
20 Services (HHS) to utilize criteria and methods similar to those utilized under the Medicare  
21 Advantage program to implement risk adjustment, and requires similar attestations/certifications  
22 from health insurance companies as to the accuracy and documentation of their risk adjustment data.  
23 The HHS risk adjustment methodology developed by and on behalf of the Centers for Medicare &  
24 Medicaid Services ("CMS") is based on the premise that premiums should reflect the differences in  
25 plan benefits, quality, and efficiency, and not the health status of the enrolled population.  
26 Accordingly, as under the Medicare Advantage program, the ACA risk adjustment model creates  
27 powerful incentives for private health insurance companies like Kaiser to over-report diagnosis  
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1 codes in order to exaggerate the expected healthcare costs for their enrollees; the more codes that  
2 are reported, the higher premiums the companies are permitted to charge, and the higher  
3 contributions will be made to such premiums by the United States.

4           8.       The United States pays billions of taxpayer dollars each year to Kaiser for the  
5 Medicare beneficiaries enrolled in its MA Plans and ACA Plans. Risk adjustment payments account  
6 for a substantial amount of these dollars. The diagnoses submitted by Kaiser drive a large percentage  
7 of the payments it receives from the Medicare Program. It is not surprising then that Kaiser is not a  
8 passive conduit of diagnoses from healthcare providers to the Medicare Program. Rather, for many  
9 years, Kaiser has conducted programs and engaged in other activities to increase the amount of risk  
10 adjustment payments from Medicare. This includes programs and other efforts to directly influence  
11 and capture both the number of diagnoses and the severity of the medical conditions reported by  
12 providers and coded by Kaiser staff.

13           9.       Ms. Bryant, until her retirement on October 3, 2017, was National Director  
14 for Kaiser's national coding quality group, and, prior to that, was Managing Director of Kaiser's  
15 Health Information Management program ("HIM") for the Kaiser Foundation Health Plan in  
16 Kaiser's Northern California ("NCAL") region. Ms. Hernandez was employed by the Kaiser  
17 Defendants in various positions from June 1995 through October 2015, and as a Kaiser contract  
18 employee through May 2016, in functions that included Regional Director of auditing and coding  
19 services for The Permanente Medical Group in Kaiser's NCAL region.

20           10.      In these positions, Relators discovered that the Kaiser Defendants were and  
21 are engaged in fraudulent schemes pursuant to which they routinely and systematically overcharge  
22 the following government programs in the following ways:

23           a.       Medicare Advantage

24                   (i)      Defendants "upcode" risk adjustment claims by manipulating the  
25 documentation and submitting claims and codes to the Medicare Advantage program for  
26 diagnoses that the member does not have or for which the member was not treated in the  
27 relevant year, or by claiming that a member was treated for a more serious condition than  
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1 the member actually has, or by documenting and submitting a diagnosis that was labeled  
2 significant when it was not, or by training, educating, and programming its personnel and  
3 systems to support these fraudulent activities; and

4 (ii) Defendants refuse to implement and ignore processes to correct (and  
5 refuse to reimburse Medicare for) previously submitted risk adjustment claims when the  
6 Defendants discover, or in the exercise of reasonable care should discover, that those  
7 previously submitted claims were false, and subvert and ignore Kaiser's internal compliance  
8 function and pressure it to cooperate; and

9 (iii) Defendants manipulate and falsify risk-adjustment data in a deliberate  
10 scheme to over-charge the Medicare Advantage program.

11 b. Affordable Care Act

12 Similarly, Defendants overdocument and upcode risk adjustment claims  
13 relevant to individuals covered by the ACA in the same manner and pursuant to the same  
14 schemes as relevant to the Medicare Advantage program, and similarly refuse to correct or  
15 reimburse Medicare for overpayments caused by this conduct, in a deliberate scheme to  
16 over-charge the Medicare program.

17 c. Through this fraudulent scheme, the Kaiser Defendants have defrauded the  
18 United States of hundreds of millions—and likely billions—of dollars for more than nine years.

19 11. Defendants' conduct alleged herein violates the federal False Claims Act. The  
20 federal False Claims Act (the "FCA") was originally enacted during the Civil War. Congress  
21 substantially amended the Act in 1986—and, again, in 2009 and 2010—to enhance the ability of the  
22 United States Government to recover losses sustained as a result of fraud against it. The Act was  
23 amended after Congress found that fraud in federal programs was pervasive and that the Act, which  
24 Congress characterized as the primary tool for combating government fraud, was in need of  
25 modernization. Congress intended that the amendments would create incentives for individuals with  
26 knowledge of fraud against the Government to disclose the information without fear of reprisals or  
27

1 Government inaction, and to encourage the private bar to commit legal resources to prosecuting  
2 fraud on the Government's behalf.

3           12. The FCA prohibits, inter alia: (a) knowingly presenting (or causing to be  
4 presented) to the federal government a false or fraudulent claim for payment or approval; (b)  
5 knowingly making or using, or causing to be made or used, a false or fraudulent record or statement  
6 material to a false or fraudulent claim; (c) knowingly making, using, or causing to be made or used,  
7 a false record or statement material to an obligation to pay or transmit money or property to the  
8 Government, or knowingly concealing or knowingly and improperly avoiding or decreasing an  
9 obligation to pay or transmit money or property to the Government; and (d) conspiring to violate  
10 any of these three sections of the FCA. 31 U.S.C. §§3729(a)(1)(A)-(C), and (G). Any person who  
11 violates the FCA is liable for a civil penalty of up to \$21,916 for each violation, plus three times the  
12 amount of the damages sustained by the United States. 31 U.S.C. §3729(a)(1).

13           13. For purposes of the FCA, a person "knows" a claim is false if that person: "(i)  
14 has actual knowledge of [the falsity of] the information; (ii) acts in deliberate ignorance of the truth  
15 or falsity of the information; or (iii) acts in reckless disregard of the truth or falsity of the  
16 information." 31 U.S.C. §3729(b)(1). The FCA does not require proof that the defendants  
17 specifically intended to commit fraud. *Id.* Unless otherwise indicated, whenever the words "know,"  
18 "learn," "discover" or similar words indicating knowledge are used in this Complaint, they mean  
19 knowledge as defined in the FCA.

20           14. Each claim for risk adjustment payments that defendants have submitted or  
21 caused to be submitted to CMS, where the patient was not treated by a qualified provider for that  
22 condition in the year in question, and/or the treatment and condition are not properly documented  
23 in the medical record is a false and/or fraudulent claim within the meaning of the FCA, so long as  
24 defendant knew that the claim was false when it was submitted, or the defendant later discovered its  
25 falsity and refused to correct the claim.

26           15. The FCA allows any person having information about an FCA violation to  
27 bring an action on behalf of the United States, and to share in any recovery. The FCA requires that  
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1 the Complaint be filed under seal for a minimum of 60 days (without service on the defendant during  
2 that time) to allow the government time to conduct its own investigation and to determine whether  
3 to join the suit.

4 16. Based on the foregoing laws, Relators Gloryanne Bryant and Victoria M.  
5 Hernandez seek, through this action, to recover damages and civil penalties arising from the false  
6 or fraudulent records, statements and/or claims that the Defendants made or caused to be made in  
7 connection with false and/or fraudulent claims for Medicare Advantage risk adjustment payments,  
8 and Affordable Care Act insurance premiums.

9 **JURISDICTION**

10 17. This Court has jurisdiction over the subject matter of this action pursuant to  
11 28 U.S.C. § 1331 and 31 U.S.C. § 3732(a), which specifically confers jurisdiction on this Court for  
12 actions brought under 31 U.S.C. § 3730.

13 18. This Court has personal jurisdiction over Defendants pursuant to 31 U.S.C.  
14 § 3732(a) because at least one of the Defendants can be found in, resides in, transacts business in,  
15 or has committed the alleged acts in the Northern District of California.

16 **VENUE AND INTRADISTRICT ASSIGNMENT**

17 19. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because a  
18 substantial part of the events or omissions giving rise to the claims occurred in San Francisco County  
19 and Alameda County, and within the Division and Courthouse in which this action has been  
20 commenced.

21 **PARTIES**

22 **I. PLAINTIFFS**

23 20. Plaintiff-Relator Gloryanne Bryant is an individual who, currently and during  
24 all times relevant to this action, resides in this judicial district. After her distinguished career in  
25 senior coding compliance positions with other California-based health care companies, Kaiser hired  
26 Ms. Bryant in May 2009 into a senior leadership position as Managing Director HIM for the Kaiser  
27 Foundation Health Plan, Northern California Revenue Cycle. Ms. Bryant remained at Kaiser until  
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1 her retirement, effective as of October 3, 2017. In September 2013, Ms. Bryant was promoted to  
2 National Director Coding Quality, Education, Systems and Support for Kaiser's National Revenue  
3 Cycle Program Office, a position which she held until her retirement. Ms. Bryant is a nationally  
4 recognized expert and educator in coding, clinical documentation improvement, and physician  
5 querying, and speaks and teaches regularly to state, regional, and national audiences. She holds  
6 professional designations of RHIA, RHIT, CCS, CDIP, and CCDS, and is an AHIMA-Approved  
7 ICD-10-CM/PCS Trainer.

8           21. Plaintiff-Relator Victoria M. Hernandez is an individual who, currently and  
9 during all times relevant to this action, resides in this judicial district. Ms. Hernandez is a coding  
10 professional with over 25 years of experience in the healthcare field. She was employed by the  
11 Kaiser Defendants in various coding leadership positions from January 2000 through October 2015,  
12 including: (i) Regional Director of Auditing & Coding Services for TPMG from October 2014  
13 through October 2015; (ii) Regional Director of Hospital Coding Audit & Education for Kaiser  
14 Foundation Health Plan from April 2012 through October 2014; and (iii) Regional Coding Review  
15 Manager for Kaiser Foundation Health Plan's Revenue Cycle HIM from February 2010 through  
16 April 2012. She holds professional designations of RHIA, CDIP, CCS, CCS-P and is an AHIMA-  
17 Approved ICD-10-CM/PCS Trainer.

18           22. The United States, on whose behalf Relator brings this suit, is the real party  
19 in interest. The United States has ongoing contracts with Defendants through CMS, in accordance  
20 with Defendants' participation in the Medicare and Medicaid programs.

## 21 **II. THE DEFENDANTS**

22           23. Kaiser Foundation Health Plan, Inc. is part of Kaiser Permanente, an  
23 integrated healthcare consortium, that operates one of the nation's largest health plans, serving over  
24 12 million members. Kaiser employs doctors and other medical professionals and provides medical  
25 services through its Permanente Medical Groups, a for-profit set of regional affiliates that includes  
26 The Permanente Medical Group ("TPMG") in Northern California, Southern California Permanente  
27 Medical Group ("SCPMG") in Southern California, and five other regional areas including Hawaii,  
28

1 the Pacific Northwest, Colorado, Georgia and the Mid-Atlantic States. Kaiser owns and operates  
 2 acute care hospitals in four regions (Northern California, Southern California, Northwest and  
 3 Hawaii), and provides care in other settings through its non-profit Kaiser Foundation Hospitals  
 4 ("KFH").

5           24. Kaiser's private health insurance plan covers the majority of its patient  
 6 population. Kaiser Foundation Health Plan, Inc. and its subsidiary health plans also operate,  
 7 however, various MA Plans, including Medicare Advantage HMO plans called "Senior Advantage,"  
 8 serving approximately 1.7 million members in 2021, and 1.4 million members in 2016, in  
 9 approximately seven states and one district. As of 2016, Kaiser's Medicare Advantage Program  
 10 served approximately 10% of Kaiser's overall patient population (10.7 million total as of 2016), but  
 11 generated approximately 30% of Kaiser's overall profits.

12           25. Kaiser reported overall operating revenue of \$88.7 billion in 2020, compared  
 13 to \$64.6 billion in 2016 and \$60.7 billion in 2015. Kaiser reported net income of \$6.4 billion in  
 14 2020, compared to \$3.1 billion in 2016 and \$1.9 billion in 2015.

15           **Kaiser Permanente Total Health Plan Membership, by Region (as of early 2017)**

16 <b>Northern California:</b>	4,134,194
17 <b>Southern California:</b>	4,390,653
18 <b>Colorado:</b>	671,500
19 <b>Georgia:</b>	306,806
20 <b>Hawaii:</b>	250,221
21 <b>Mid-Atlantic States (Va., Md., D.C.):</b>	702,516
22 <b>Northwest (Ore./Wash.):</b>	575,688
23 <b>Washington:</b>	677,050

1 Source: <https://share.kaiserpermanente.org/article/fast-facts-about-kaiser-permanente/>

2  
3 26. Pursuant to inter-company agreements, the Kaiser Foundation Health Plan,  
4 Inc. and its subsidiaries share moneys received from federal and state governments with Kaiser's  
5 various Permanente Medical Groups and Kaiser Foundation Hospitals. Accordingly, all of the  
6 named Kaiser Defendants possess financial interests in maximizing the amounts claimed to and paid  
7 by the governments, and each Kaiser Defendant has participated in various aspects of the fraudulent  
8 practices, as described further herein.

9 27. Defendant Kaiser Foundation Health Plan, Inc. is a California corporation  
10 with its principal place of business in Oakland, California within this judicial district.

11 28. Defendant Kaiser Foundation Hospitals is a California corporation with its  
12 principal place of business in Oakland, California within this judicial district.

13 29. Defendant The Permanente Medical Group, Inc. ("TPMG") is a California  
14 corporation with its principal place of business in Oakland, California within this judicial district.  
15 TPMG operates all Kaiser medical group operations in the Northern California region ("NCAL  
16 region").

17 30. Defendant Southern California Permanente Medical Group ("Southern  
18 California PMG" or "SCPMG") is a California corporation with its principal place of business in  
19 Pasadena, California. SCPMG operates all Kaiser medical group operations in the Southern  
20 California region ("SCAL region").

21 31. Defendant Colorado Permanente Medical Group, P.C. ("Colorado PMG") is  
22 a Colorado corporation with its principal place of business in Denver, Colorado. The Colorado  
23 PMG operates all Kaiser medical group operations in the Colorado region.

24 32. Defendant The Southeast Permanente Medical Group, Inc. ("Southeast  
25 PMG") is a Georgia corporation with its principal place of business in Atlanta, Georgia. The  
26 Southeast PMG operates all Kaiser medical group operations in the Southeast region.

1           33. Defendant Hawaii Permanente Medical Group, Inc. ("Hawaii PMG") is a  
2 Hawaii corporation with its principal place of business in Honolulu, Hawaii. The Hawaii PMG  
3 operates all Kaiser medical group operations in the Hawaii region.

4           34. Defendant Mid-Atlantic Permanente Medical Group, PC ("Mid-Atlantic  
5 PMG") is a Maryland corporation with its principal place of business in Rockville, Maryland. The  
6 Mid-Atlantic PMG operates all Kaiser medical group operations in the Mid-Atlantic region,  
7 including Georgia.

8           35. Defendant Northwest Permanente, P.C. ("Northwest PMG") is an Oregon  
9 corporation with its principal place of business in Portland, Oregon. The Northwest PMG operates  
10 all Kaiser medical group operations in the Northwest region, including Oregon.

11           36. Defendant Washington Permanente Medical Group, P.C. ("Washington  
12 PMG") is a Washington corporation with its principal place of business in Seattle, Washington. The  
13 Washington PMG operates all Kaiser medical group operations in the Washington region.

14           37. TPMG, Southern California PMG, Colorado PMG, Southeast PMG, Hawaii  
15 PMG, Mid-Atlantic PMG, Northwest PMG, and Washington PMG are referred to collectively  
16 herein as "The Permanente Medical Groups" or "PMGs". The PMGs have a national leadership and  
17 consulting organization, the Permanente Federation, which is run by the leadership of the PMGs.  
18 Unless stated otherwise, references to Kaiser actions or conduct taking place in a particular Kaiser  
19 region refers to the actions or conduct of the specific Permanente Medical Group that operates in  
20 that region.

21           38. Defendants Kaiser Foundation Health Plan of Colorado, Kaiser Foundation  
22 Health Plan of Georgia, Inc., Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc., Kaiser  
23 Foundation Health Plan of the Northwest, and Kaiser Foundation Health Plan of Washington are  
24 corporations organized under the laws of, and with their principle places of businesses in, Colorado,  
25 Georgia, Maryland, Oregon and Washington, respectively, and are subsidiaries of Kaiser  
26 Foundation Health Plan, Inc.

**THE LAW**

**A. Medicare Advantage (Medicare Part C)**

39. Under Medicare Part C, the Medicare Program pays each MA Organization a predetermined monthly amount for each Medicare beneficiary in the plan. This monthly payment is known as a "per-member, per-month" payment (or "PMPM"). This capitated payment for each plan varies depending on various factors, including amounts set forth in the plan's bid submitted to CMS. Since 2000, Congress has also required that the payments be risk adjusted for each beneficiary based on demographic factors (*e.g.*, gender, age) and health status. By risk adjusting for health status, Congress required that more be paid for beneficiaries with higher risk scores than be paid for beneficiaries with lower risk scores. CMS currently employs a health-based risk adjustment model — known as the Hierarchical Conditions Category ("HCC") model — that takes into account diagnoses from inpatient hospital stays, emergency and outpatient surgery encounters, and physician office visits.

40. The HCC model is prospective, meaning that it relies on diagnoses for certain medical conditions assigned to beneficiaries by their physicians in a one calendar year timeframe (referred to by CMS as the "data collection" year but also generally known as the "date of service" or "DOS" year) to set the payment for each beneficiary for the following year (often referred to as the "payment year" or "PY"). The medical conditions included in the model are grouped into HCCs, which are categories of clinically-related medical diagnoses. *See* 42 C.F.R. § 422.2. The diagnoses grouped into HCCs include major, severe/acute, and/or chronic illnesses. Related groups of diagnoses are ranked on the basis of disease severity and the cost associated with their treatment. Between 2004 and 2013, the CMS-HCC model included 70 HCCs. Starting in 2014, the CMS-HCC model included 79 HCCs.

41. The Government assigns a relative numerical value/weight to each HCC group that correlates to the predicted incremental costs of care associated with treating the medical conditions in each category. It determines the relative values based on the amounts that it paid to fee-for-service providers to treat these major, severe, and chronic medical conditions under Parts A

1 and B of the Medicare Program. Higher relative values/weights are assigned to HCCs that include  
2 diagnoses with greater disease severity and greater costs associated with their treatment.

3           42. As previously stated, the HCC risk adjustment model is prospective and a  
4 beneficiary's risk score for a particular payment year is determined by his or her medical conditions  
5 during the previous year (*i.e.*, the date of service year). These medical conditions must be  
6 documented by a qualified healthcare provider (*e.g.*, a doctor, physician's assistant, etc. as defined  
7 by the CMS MA program) in the beneficiary's medical record during the previous year.

8           43. Each beneficiary's risk score is calculated anew for each payment year. For  
9 example, a beneficiary's risk score for payment year 2012 is determined by the diagnoses that his or  
10 her qualified healthcare providers documented in his or her medical records during face-to-face  
11 medical encounters during date of service year 2011.

12           44. MA Organizations obtain diagnosis data from the healthcare providers that  
13 treat the beneficiaries in their plans. Healthcare providers can transmit diagnosis codes to MA  
14 Organizations with claims for payment for services rendered, in encounter records reporting the  
15 services rendered, or by alternative means.

16           45. MA Organizations submit risk adjustment data, including diagnoses, to CMS  
17 using CMS' Risk Adjustment Processing System ("RAPS"). Each RAPS submission must include  
18 the following information: the Medicare beneficiary's identification number (called a "HIC number"  
19 or "HICN"); the date(s) of the medical encounter; the type of provider (physician or hospital); and  
20 the diagnosis code(s) reported by the provider for the encounter. Medical encounters include  
21 physician office visits, hospital outpatient visits, and hospital inpatient stays.

22           46. MA Organizations are entitled to risk adjustment payments based on the  
23 diagnosis codes that they submit to CMS only if the codes are from face-to-face medical encounters  
24 between the Medicare beneficiary and provider, the encounter occurred during the relevant date of  
25 service year, the provider was of a type and specialty acceptable for risk adjustment purposes, and  
26 at the time of the encounter, the provider documented the medical conditions identified by the  
27 diagnosis codes in the medical record based on acceptable documentation. In addition, codes should  
28

1 be based on documented conditions that require or affect patient care treatment or management. *See*  
2 2008 Risk Adjustment Data Technical Assistance for Medicare Advantage Organizations  
3 Participant Guide ("2008 RA Participation Guide") at § 6.4.1.

4 47. Risk adjustment claims are true, and the resulting risk adjustment payments  
5 are valid, only to the extent that the diagnosis codes submitted by the MA Organizations are valid.  
6 The diagnoses must be coded according to the *International Classification of Diseases (ICD)*  
7 *Clinical Modification Guidelines for Coding and Reporting* ("ICD-9- CM" & "ICD-10-CM") and  
8 documented with sufficient clinical specificity. All diagnosis codes submitted by MA Organizations  
9 must be supported by medical record documentation. If the medical record is ambiguous, it cannot  
10 be relied on for diagnosis information for risk adjustment payments. *See* 2008 RA Participation  
11 Guide at § 7.2.4.1 (stating that risk adjustment claims and payments cannot be based on questionable  
12 diagnoses).

13 48. MAOs have a statutory obligation to report and return any overpayment  
14 received from the Government, 42 U.S.C. § 1320a-7k(d). Further, federal regulations are clear that  
15 MAOs like Kaiser are required to report and return both overpayments that they have identified and  
16 overpayments that they "should have determined through the exercise of reasonable diligence" were  
17 made by CMS. 42 C.F.R. 422.326(c). The law is clear that any overpayment retained after the  
18 statutory deadline of 60 days is an "obligation" for purposes of 31 U.S.C. § 3729. 42 U.S.C.  
19 § 1320a-7k(d)(4)(B) (defining overpayments); 42 C.F.R. 422.326(e).

20 **B. Affordable Care Act ("ACA")**

21 49. The Affordable Care Act sets up a program of risk adjustment in individual  
22 and group markets to lessen or eliminate the influence of risk selection on the premiums that plans  
23 charge. In the risk adjustment model utilized under the ACA, which is named the HHS-Hierarchical  
24 Condition Categories ("HHS-HCC") risk adjustment model, HHS utilizes criteria and methods  
25 similar to those utilized under the Medicare Advantage program, and adapts Medicare Advantage  
26 HCCs for use in the HHS-HCC model. The chief goal in the design of the HHS-HCC model is to  
27 assure that premiums reflect differences in benefits and plan efficiency. The HHS-HCC model uses  
28

1 current year diagnoses and demographics to predict the current year's spending, as distinguished  
2 from the Medicare Advantage program, which uses the risk adjustment model to predict next year's  
3 spending. But in the end, the effect of risk adjustment on ACA premiums is similar to the impact  
4 of risk adjustment on capitated payments made under the Medicare Advantage program. Insurers  
5 like Kaiser receive more ACA premiums the more documented and coded conditions are submitted  
6 for their insureds.

7 50. Pursuant to the ACA, the United States contributes, through tax credits, to  
8 premiums paid by low-income individuals to private health insurance companies, including Kaiser,  
9 based upon a sliding scale calibrated to the poverty line. Accordingly, when premiums are  
10 artificially high due to documentation and coding fraud, both enrollees and the United States are  
11 harmed by the overcharges.

## 12 THE FACTS

### 13 **I. KAISER AND ITS RELATED COMPANIES OVERDOCUMENT AND 14 OVERCODE/UPCODE "HIGH-VALUE" HIERARCHICAL CONDITION CODES ("HCCS")**

15 51. Ms. Bryant and Ms. Hernandez have witnessed Kaiser and its related  
16 companies engage in systematic fraud on the Medicare Advantage program, and other government  
17 programs including the ACA, for many years through teaching and implementing "HCC  
18 maximization techniques" to physicians and coding staff, resulting in systematic over-documenting,  
19 over-coding and upcoding of certain high value HCCs, as detailed below. The HCCs directly impact  
20 risk adjustment scores, meaning that the Government overpays Kaiser for its patient population  
21 which is not as sick as Kaiser reports.

22 52. Kaiser submitted a Risk Adjustment Attestation to the Medicare Program  
23 each year after the final risk adjustment submission deadline and knew that it was required to submit  
24 a truthful Risk Adjustment Attestation. Despite its obligations under Medicare law, Kaiser's  
25 documentation, coding and Risk Adjustment Attestations have been false.

#### 26 **A. Aortic Atherosclerosis ("AA")**

##### 27 **(i) Clinical significance, documentation and coding convention**

1           53.     AA is sometimes referred to as "hardening of the arteries." It describes a  
2 thickening and loss of elasticity in the arterial wall. This condition is often an incidental finding in  
3 radiology and imaging reports and neither treated nor managed after being identified. It often has  
4 no impact on patient care or outcomes. Unless AA is related to signs, symptoms or  
5 conditions/diagnoses that necessitated the performance of the radiology and imaging test, treatment  
6 and management is actually directed toward the AA, or a follow-up office visit is ordered for  
7 treatment, it should not be reported/coded to Medicare.

8           54.     For example, the American Hospital Association's ("AHA") Coding Clinic,  
9 the official clearing house for ICD-9-CM and ICD-10-CM/PCS coding guidance, publishes the  
10 following guidance for outpatient encounters, including emergency room visits: "It is inappropriate  
11 to report an incidental finding found on a radiology report when the finding is unrelated to the sign,  
12 symptom, or condition that necessitated the performance of the test for a patient being seen in the  
13 emergency department (ED). The ED physician would need to clarify that the finding was clinically  
14 significant and related to the visit in order for it be coded." *See Exhibit 1.*

15           55.     Official Coding and Reporting Guidelines applicable to inpatient encounters  
16 further confirm the standard:

17           encounters for diagnostic tests that have been interpreted by a provider.

18 When it is coded, AA is currently assigned ICD-10-CM code 170.0 (Atherosclerosis of Aorta).  
19 Under ICD-9-CM, AA was assigned ICD-9-CM code 440.0 (Atherosclerosis of Aorta). The AA  
20 diagnosis is assigned to HCC 108; in 2016, Kaiser received approximately \$2,260 for each HCC  
21 108 code.

22           **(ii) Kaiser's scheme**

23           56.     Labeled an "area of significant missed opportunity" by Kaiser's Medicare  
24 Finance Group and Kaiser's Permanente Medical Groups, Kaiser implemented an HCC initiative in  
25 2011 to review and capture AA diagnoses in all clinic, emergency, outpatient surgery, and inpatient  
26 encounters, even when incidental to the encounter. In Kaiser's NCAL region, Kaiser subsidiary  
27  
28

1 TPMG trained its physicians to choose a diagnosis from Kaiser's proprietary, electronic diagnosis  
2 "pick list" to capture AA, even when it was merely an incidental finding.

3           57. Kaiser's TPMG senior clinician leaders took the position that AA is a  
4 "chronic, systemic condition" that is a permanent risk factor once diagnosed, and thus is properly  
5 codeable regardless of its actual significance or treatment. This interpretation, if accurate, would  
6 result in the AA diagnosis meeting the Official Coding and Reporting Guideline for the coding of a  
7 systemic condition without coding staff questioning it. Kaiser's NCAL TPMG region directed  
8 Regional Health Information Management ("Regional HIM") coding leaders to instruct and train to  
9 "always code" AA on the basis that it was supposedly a systemic condition and should always be  
10 coded. This direction and instruction ignored coding conventions and guidance, and internal  
11 feedback from Kaiser NCAL's Regional HIM, including Ms. Bryant and Ms. Hernandez who  
12 questioned whether this condition was truly systemic. This improper TPMG direction was  
13 eventually migrated to Kaiser's other regions as a "best practice."

14           58. Kaiser's NCAL Regional HIM, led by Ms. Bryant, remained uncomfortable  
15 with the TPMG instruction on AA. Ms. Bryant had numerous conversations with individuals within  
16 TPMG and others within Kaiser regarding her and her colleagues' concerns, and submitted a written  
17 inquiry to AHA Coding Clinic as to whether the diagnosis of AA is properly considered a chronic,  
18 systemic condition (similar to hypertension and diabetes mellitus) that is codeable on a routine basis  
19 even in the absence of treatment, management, and/or monitoring. The guidance received from  
20 AHA Coding Clinic subsequently rejected NCAL TPMG's clinical determination. But TPMG  
21 management exerted intimidation, pressure and other undermining techniques to silence Ms. Bryant  
22 and her Regional HIM staff.

23           59. To provide "documentation" that would constitute evidence of the clinical  
24 significance of AA and meet the Official Coding and Reporting Guidelines, Kaiser's NCAL TPMG  
25 region developed a "SMARTPHRASE" to automatically populate the medical record when AA was  
26 observed and/or diagnosed in radiology and imaging reports that would routinely, automatically,  
27 and falsely state that the diagnosis was significant, not incidental, and would require clinical follow-

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1 up, often through the use of "addenda" added to the medical record long after the medical visit. This  
2 process was implemented so that the hospital coding staff would assign the ICD-9-CM code for AA,  
3 and the HCC for AA would be captured.

4           60. Ms. Bryant continued to bring her concerns to Kaiser's National Compliance  
5 Ethics & Integrity Office ("National Compliance Office" or "NCO") and finally, in August 2015,  
6 Kaiser NCO announced that a Kaiser Permanente ("KP") clinical review overruled NCAL TPMG's  
7 clinical determination that AA is a chronic, systemic condition that should always be coded. But  
8 three years had passed and hundreds of thousands of inaccurate, false codes entered before that  
9 belated direction was issued. There was no discussion of or action plan developed to address the  
10 inaccuracies of the past with the AA diagnosis and HCC capture.

11           61. Kaiser coded data reports from 2010-2016 shows that the increased AA  
12 diagnosis-capture scheme worked – AA diagnoses and coding increased four- and five-fold across  
13 all Kaiser regions over that period and spread to all patient populations and payers.

14           **(iii) Chronology and evidence**

15           62. In late 2011, members of Kaiser's National Compliance Office and NCAL  
16 Revenue Cycle teams for The Kaiser Foundation Health Plan and Hospitals ("NCAL KFHP")  
17 focused attention on the accurate coding of AA as a result of internal inquiries and requests for  
18 guidance. After an exchange of emails, members of these teams, including Ms. Bryant and Ms.  
19 Hernandez, drafted and published a memo to all Regional HIM Directors and hospital Coding Staff  
20 in March 2012 outlining the correct coding convention for AA. *See Exhibit 2*. The memo correctly  
21 stated that AA should not be coded except under certain limited conditions (see above).

22           63. TPMG Director Anne Cadwell, NCAL Revenue Cycle VP David Nyburg,  
23 and TPMG Physician Liaison Dr. David Bliss reacted unfavorably to this memo immediately. In  
24 calls with Ms. Bryant, they took the position that AA "is always significant and a risk factor so thus  
25 they will teach the MDs to document that so it will be coded." *See Exhibit 3*. Ms. Bryant noted that  
26 she was "troubled" by this approach in an email to Janet Franklin, Kaiser's Senior Compliance  
27 Practice Leader in its National Compliance Office. *Id.* Ms. Hernandez and other HIM coding  
28

1 leaders shared Ms. Bryant's concern. No definitive guidance was provided nor action taken by  
2 Kaiser's National Compliance Office.

3           64. In 2012, TPMG trained its doctors to document AA as if it were always  
4 significant, and KFH hospital coding staff to always code AA, as directed by Dr. Bliss and other  
5 TPMG Directors (*e.g.*, Anne Cadwell, Karen Graham, and Erica Eastham). In a December 3, 2012  
6 email, TPMG's Ms. Cadwell wrote to Ms. Bryant and Ms. Hernandez that she was concerned that  
7 Kaiser Hospital coding staff was not getting the communication about AA: "We need to get  
8 everyone on the same page that AA is **not** an incidental finding from a clinical perspective." *See*  
9 Exhibit 4 (emphasis in original). Ms. Bryant and Ms. Hernandez felt that they were being strongly  
10 pressured to violate coding guidelines and to participate in manipulating documentation and codes.

11           65. During a December 12, 2012 WebEx/call with TPMG, TPMG Director Ms.  
12 Cadwell told NCAL HIM Leadership that the NCAL region would develop and implement a  
13 "SMARTPHRASE" for its doctors to add to, or "addend," the patients' electronic files (*e.g.*, in their  
14 EPIC electronic health records, called "KP Health Connect") whenever AA was found on a  
15 radiology report in order to indicate its significance, even months after the encounter. It was  
16 requested that NCAL HIM leadership approve this documentation so that AA would be "always  
17 coded." *See* Exhibit 5 (WebEx meeting invitation).

18           66. The "SMARTPHRASE" developed by TPMG in Kaiser's NCAL region  
19 stated as follows: "Aortic Atherosclerosis noted on review of the radiology exam associated with  
20 chart review and this visit. Will follow longitudinally as an independent risk factor for CVD and  
21 CVA, with management per standard risk factor controls over time by PCP or appropriate  
22 specialist." *See* Exhibit 6 at REL0000061. This phrasing was developed in an attempt to satisfy the  
23 numerous concerns raised by NCAL HIM Leadership (*i.e.*, Ms. Bryant and Ms. Hernandez) that  
24 documentation of AA was required, including language of clinical significance, to pass audit and/or  
25 coding compliance testing. But it was clinically false and misleading. AA can be clinically  
26 insignificant and incidental and should not always be coded, but Kaiser was training its physicians  
27 to always document the clinical significance of the findings so as to cause coders to always code it

1 without question. In December 2012, NCAL HIM was still waiting for Kaiser's National  
2 Compliance Office to provide definitive guidance. In the meantime, Ms. Bryant and Ms. Hernandez  
3 made repeated but futile attempts to help TPMG leadership understand the compliant and  
4 appropriate documentation for the coding of AA.

5           67. By January 2013, Dr. Bliss, TPMG Director Ms. Cadwell and other senior  
6 management had fully overridden the coding memo issued in March 2012 by NCAL HIM  
7 Leadership. Summarizing Kaiser NCAL's new directive for coding AA in the hospital setting, Ms.  
8 Bryant emailed Kaiser's National Compliance personnel, including Ms. Franklin, as follows  
9 (copying Ms. Hernandez) to alert NCO as to the new direction in the NCAL region: "TPMG takes  
10 the position that once AA is present it never goes away and is then a lifelong risk factor .... We  
11 (NCAL) do believe that AA meets the criteria to be reportable and does impact care and decision  
12 making. To go further with this discussion I believe needs individual with greater clinical  
13 knowledge like physicians and would invite TPMG *i.e.* Dr. David Bliss) [sic] to discuss this further."  
14 *See Exhibit 7.* Kaiser's National Compliance Office did nothing to stop this new direction.

15           68. In fact, Ms. Bryant was required to be "supportive," "collaborative," and a  
16 "partner" with TPMG's direction for capturing the AA HCC by putting together an educational  
17 power point presentation with Dr. Bliss titled "Documentation and Coding Aortic Atherosclerosis  
18 Clarification," which they presented during a January 2013 WebEx conference call for NCAL  
19 Regional hospital coding staff and Clinical Documentation Integrity Staff (CDI). *See Exhibit 8.*  
20 The presentation identified AA as an "Area of significant missed opportunity."<sup>1</sup> *Id.* at REL0000069.  
21 The presentation adopted TPMG's and Dr. Bliss' position that AA is a "systemic disease" that should  
22 always be diagnosed, documented, and coded when identified in a radiology report, and should be  
23 added to Kaiser's "Always Code" List (which is a Kaiser National Compliance Office document).

24  
25  
26 <sup>1</sup> Two years earlier, in a September 2011 power point presentation entitled "Documentation and  
27 Coding Leads Meeting," TPMG used the same phrase for capturing AA – "Area of significant  
28 missed opportunity" – establishing that capturing the diagnosis had been a long-term focus in the  
Kaiser NCAL region. *See Exhibit 9* at REL0000107.

1           69.     Similar presentations were made throughout 2013, 2014 and 2015 to various  
2 Kaiser regional leadership audiences. TPMG's AA directive and smartphrase were migrated to  
3 Kaiser's other regions and adopted by Kaiser's other Permanente Medical Groups. For example, at  
4 Kaiser's Regional Reporting Group ("RRG") meetings, Kaiser regional leaders overseeing its  
5 Medicare Advantage programs presented on opportunities and techniques to capture high-yield  
6 HCCs, including AA, emulating NCAL TPMG. *See Exhibit 10* at REL0000137. Similarly, Kaiser  
7 NCAL's Revenue Cycle Clinical Documentation Integrity/Improvement ("CDI") included vascular  
8 disease (including AA) as an HCC target, and an opportunity to query physicians based on radiology  
9 and imaging findings. *See Exhibit 11* at REL0000179-80.

10           70.     On behalf of NCAL HIM Regional Leadership, Ms. Bryant remained deeply  
11 concerned and continued to pursue direction and guidance from Janet Franklin of Kaiser's National  
12 Compliance Office, but received none. Moreover, Ms. Bryant and NCAL HIM Regional  
13 Leadership, including Ms. Hernandez, continued to question the new direction taken by TPMG  
14 leadership regarding AA diagnosis and coding. Due to her continued concern, Ms. Bryant went so  
15 far as to submit a question to AHA Coding Clinic, the recognized authority on ICD-9 and ICD-10  
16 coding, on the issue in December 2012. *See Exhibit 12*.

17           71.     Kaiser drafted queries to Coding Clinic at least two other times regarding the  
18 proper coding of AA (*see Exhibit 13*): In May 2013, Kaiser queried Coding Clinic regarding the  
19 status of AA as "a chronic systemic condition." *Id.* at REL0000189. In its May 16, 2013 response,  
20 Coding Clinic stated that if the impact of AA were unclear, the physician should be queried. *Id.*  
21 Over a year later, in approximately November 2014, Kaiser NCO's Janet D. Franklin, with the  
22 assistance of Ms. Bryant, drafted a detailed follow-up question to AHA Coding Clinic: Would AA  
23 "be considered a systemic condition that can be coded even in the absence of active intervention in  
24 the same way that other systemic diagnoses noted in Coding Clinic (*e.g.* COPD, CHF, Diabetes,  
25 Parkinson's Disease, hypertension) may be coded without additional documentation of evaluation,  
26 treatment, consideration, etc.?" *Id.* at REL0000186-87. Ms. Franklin noted in the attached exhibit  
27 that her draft was subject to review by Dr. Simon Cohn, Kaiser's physician lead for The Medical  
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1 Group Federation and RRG, and other Kaiser staff. Ms. Bryant was later told by Nancy Anderson  
2 of Kaiser's NCO group that the question was never submitted to AHA Coding Clinic based upon a  
3 decision by Kaiser leadership, yet another Kaiser decision that caused Ms. Bryant and Ms.  
4 Hernandez significant concern.

5           72. In the meantime, while the Permanente Medical Groups in Kaiser's other  
6 regions were following TPMG's practice to always document and code AA, Kaiser's National  
7 Compliance Office was taking its time deciding whether that direction was proper. On July 23,  
8 2014, TPMG approached Ms. Bryant and Ms. Hernandez to meet to discuss viewpoints regarding  
9 AA capture for Kaiser's National Compliance office. See Exhibit 14 (calling the long-delayed  
10 meeting "a high priority and time critical").

11           73. On July 31, 2014, a presentation was given to Kaiser's Coding Governance  
12 Group (CGG), which represents all Kaiser Regions, on the topic of AA capture for coding, taking  
13 the position that AA should be added to Kaiser's "Always Code List" as a chronic, systemic  
14 condition. See Exhibit 15 at REL0000220.

15           74. In 2015, Dr. Simon Cohn, the physician lead for Kaiser's Medical Group  
16 Foundation and RRG, requested that Ms. Bryant meet with him face-to-face, but did not provide the  
17 topic of the discussion in advance. During the meeting in Dr. Cohn's office, Dr. Cohn asked Ms.  
18 Bryant to summarize the events surrounding AA HCC capture at Kaiser, including the TPMG  
19 guidance and direction of Dr. Bliss and others, which she did. Dr. Cohn told Ms. Bryant that this  
20 issue was being further reviewed by the medical groups. Ms. Bryant told Dr. Cohn that it was not  
21 her place to question the clinical and medical interpretations of Dr. Bliss, so she accepted his  
22 direction but felt compelled to go to NCO for further and final advice. In the meantime, the improper  
23 coding of AA continued throughout Kaiser, with Kaiser physicians being instructed, trained, and  
24 prompted to add the HCC diagnosis during or even months after patient encounters through addenda  
25 to the medical records.

26           75. *Finally*, on August 4, 2015, Kaiser's National Compliance Office and  
27 Medical Group Federation completed its "clinical review" of TPMG's AA directive, requiring that  
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1 it be changed back to the way that Ms. Bryant, Ms. Hernandez and their colleagues in NCAL HIM  
2 stated it in 2011 and early 2012: "After having gone through clinical review, AA is not considered  
3 a systemic condition and will not appear on the final list of examples of systemic conditions. The  
4 clinician must do more than just list this condition. There must be documentation to show how it  
5 impacted the current encounter. It will be up to the region to decide if they want to query the  
6 provider about this condition when it is only listed. Without a query and additional documentation  
7 from the provider to show how it impacted the encounter, it cannot be coded." See Exhibit 16 at  
8 REL0000224. This information from NCO was shared with Kaiser Coding Leaders as well so that  
9 they would be informed and comply with the directive.

10 **(iv) Impact of Kaiser's HCC AA "missed opportunity" directive**

11 76. Kaiser's internal data establishes that its efforts to mine for AA succeeded in  
12 capturing and submitting an enormous increase of AA codes to Medicare and other payers,  
13 beginning with fewer than 600,000 AA codes captured and submitted in 2010 and culminating in  
14 over three million submitted in 2015. AA Dx ("Diagnosis") Frequency Report 2010-2016 (Source:  
15 Kaiser internal data aggregated by Ms. Bryant) see Exhibit 17 at REL0000226. Medicare claims  
16 for HCC 108 (Vascular Disease), the classification that includes AA diagnoses, were among the  
17 highest in number and revenue for Kaiser during 2014-2016. See Exhibit 18 at REL0000254. (Over  
18 350,000 HCC 108 cases in 2014 submitted for almost \$800 million in revenue).

19 77. In early 2016, Ms. Bryant discovered in the course of ICD-10-CM/PCS  
20 national coding quality monitoring and coding validation that Kaiser was still coding AA based  
21 upon it being a systemic condition, notwithstanding the August 2015 conclusion of Kaiser NCO  
22 rejecting AA as a "chronic, systemic condition." Ms. Bryant, who was at that time working in  
23 Kaiser's National Revenue Cycle group, shared this finding with Ms. Hernandez, who was also  
24 working for this group at the time. Both Ms. Bryant and Ms. Hernandez were disturbed and  
25 troubled. Ms. Bryant brought the AA findings to the attention of Janet D. Franklin and Nancy  
26 Anderson of Kaiser NCO. Ms. Bryant requested that the appropriate coding guidance be posted in  
27 the National Coding Bulletin Board for all Kaiser Regions to see. She also provided the appropriate  
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1 coding advice on AA to regional HIM leaders during leadership forum meetings and requested that  
2 each region disseminate the guidance to all appropriate staff and stakeholders, including Kaiser's  
3 medical groups.

4 78. In 2016, after Kaiser had started to pull back the directive, there were still  
5 almost two million AA codes submitted across payers. Exhibit 17. In just the first four months of  
6 2016, Kaiser reported to Medicare Advantage over 300,000 cases of vascular disease (HCC 108),  
7 which includes the AA diagnosis codes, accounting for almost \$700 million. Exhibit 18. Many  
8 Kaiser members now have the diagnosis of AA assigned to their clinical profiles incorrectly,  
9 potentially impacting patients' future insurance coverage and profile.

10 79. Ms. Bryant's and Ms. Hernandez believe and therefore allege that Kaiser has  
11 never gone back to validate the accuracy of AA documentation and coding for years prior to 2016,  
12 and has never repaid, restated, or otherwise reimbursed amounts falsely obtained during this period  
13 from over-diagnosing and over-coding AA. Moreover, they believe and therefore allege that there  
14 has been no specific AA validation of documentation and coding or discussion regarding rebilling  
15 or resubmission of corrected claims or data. Indeed, shortly before her retirement from Kaiser in  
16 October 2017, Ms. Bryant was asked by NCO's Nancy Andersen to join a coding workgroup to look  
17 at AA, as the Kaiser Medical Groups wanted to revisit the issue, *yet again*, of whether the condition  
18 is "systemic." Thus, Kaiser continues its efforts to avoid "missed opportunities" with this false  
19 documentation and coding.

20 **B. Mechanical Ventilation Dependence Status ("Vent Dependence")**

21 **(i) Clinical significance, documentation and coding convention**

22 80. The HCC for "dependence on respirator status" is HCC 82 (linked with ICD-  
23 9-CM code V46.11 (Dependence on respirator, status) and ICD-10-CM code Z99.11 (Dependence  
24 on respiratory ventilator status)). Dependence on respirator (or ventilator) status is a "status code"  
25 that is used when a patient requires long-term, continued ventilator support to breathe beyond the  
26 acute care phase. The status code is/was reported for both Medicare Advantage HCCs and HHS  
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1 HCCs (*e.g.*, Medicaid under the Affordable Care Act). In 2016, Kaiser received approximately  
2 \$11,497 for each HCC 82.

3           81. On February 7, 2014, Coding Clinic stated in a specific response to Kaiser's  
4 inquiry – an inquiry initiated by Ms. Bryant with Ms. Hernandez's input – that "this code should be  
5 reported when the patient requires continued ventilator support for an unexpected period of time  
6 and not for the short-term acute phase of a condition." Coding Clinic further stated that "there is no  
7 time frame set on what constitutes ventilator dependency." *See Exhibit 19.*

8           82. In short, the HCC for vent dependence status should never be coded, and  
9 "respirator dependence," "ventilator dependence," "vent status," or similar terminology should never  
10 be documented in the medical record, if a patient is weaned from a ventilator during or at the end of  
11 an acute short-term stay in the hospital (of whatever length) and discharged home or to a post-acute-  
12 care facility without clinically requiring vent support. That does not constitute "vent dependence  
13 status." Rather, a patient is vent dependent only if the patient relies on the ventilation to live on a  
14 long-term basis *and not for the short-term acute phase of a condition.*

15           **(ii) Kaiser's scheme**

16           83. Kaiser's directives on vent dependence documentation and coding differ  
17 region by region, but were all similarly invalid, with regions establishing a "time frame"-based  
18 criteria for documenting vent dependence status after which the specific code assignment is  
19 permitted. For example, TPMG, the medical group in Kaiser's NCAL region, initially defined the  
20 time period as 12 hours or more but later changed it to 30 days or more on a ventilator before the  
21 status condition should be documented and then coded irrespective of discharge status or  
22 disposition. Kaiser's Southern California PMG only required 21 days as its time-frame criteria for  
23 documenting and coding this status.

24           84. These directives contravened AHA Coding Clinic's caution that there is no  
25 "set time frame" and that vent dependence should not be reported for the short-term acute phase of  
26 a condition. Kaiser, especially its Permanente Medical Groups, consciously ignores Coding Clinic's  
27 response, instead criticizing and rejecting Ms. Bryant's professional coding decision to seek input  
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1 from Coding Clinic in the first place, which led to Ms. Bryant being excluded from further coding  
2 discussions on this topic and others. By elevating set time periods over actual long-term dependence,  
3 Kaiser manipulated the system to over-document and over-code for vent dependence status. Any  
4 patient that is on a ventilator for a set period of time is assigned the status code by Kaiser, even if  
5 the patient's reliance is neither long-term nor continuous but instead arises from the acute phase of  
6 a condition or following a procedure.

7           85. Moreover, Kaiser ignored its own improper directives by coding for vent  
8 dependence status even when patients are on vents for just a few days, then discharged without the  
9 vent. Kaiser data shows high volumes of patients being coded for vent dependence status even after  
10 being discharged from the acute care hospital without a ventilator, and even for lengths of stay as  
11 short as one or two days across four hospital regions, and in the outpatient physician office/clinic  
12 setting after discharge.

13                   **(iii) Chronology and evidence**

14                           **(A) October/November 2013**

15           86. Ms. Hernandez and Ms. Bryant were first made aware of Kaiser's vent  
16 dependence status documentation and coding practices in the context of newborns that are placed  
17 on ventilators temporarily in the hospital before being discharged home. This came about due to  
18 the patient population impacting the Affordable Care Act, and questions were raised internally by  
19 Regional NCAL HIM leadership (Ms. Bryant, Ms. Hernandez and Dawna Toews) about whether  
20 V46.11 (vent dependence status) was appropriate in this circumstance. Ms. Bryant, Ms. Hernandez  
21 and Ms. Toews were extremely concerned with the direction that TPMG wanted to take with the  
22 V46.11 status code. The three of them discussed the situation and agreed that the status code should  
23 be infrequently assigned and coded; given the high number of such codes at Kaiser, it thus appeared  
24 that TPMG was focusing on capturing this status code inappropriately.

25           87. In a series of meetings and emails, chronicled contemporaneously by Ms.  
26 Hernandez (*see Exhibit 20*), Ms. Hernandez and Ms. Bryant investigated Kaiser's existing  
27 documentation and coding practices, researched the proper coding convention, reached out to  
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1 external clinical and coding experts and, on November 21, 2013, submitted email queries to AHA's  
2 Nelly Leon-Chisen, Director and Editor of Coding Clinic, and a separate email to Sue Bowman,  
3 American Health Information Management Association ("AHIMA") Senior Director of Coding  
4 Policy and Compliance. ("AHIMA," like AHA's Coding Clinic, is a neutral organization that can  
5 be queried for guidance by coding professionals.)

6 88. On November 22, 2013, AHIMA's Ms. Bowman responded by email as  
7 follows: "V46.11 is intended for 'dependence' on a ventilator – meaning long-term dependence  
8 (such as patients with spinal cord injuries or progressive neuromuscular diseases such as multiple  
9 sclerosis) – not for short-term use of a ventilator during an acute illness, following surgery, etc. So  
10 it seems unlikely that a newborn would be declared ventilator-dependent". *Id.* at REL0000262.

11 89. On November 25, 2013, Kaiser's NCAL HIM's Regional Coding Review  
12 Managers met onsite. All agreed that the vent dependence status code would not be appropriate for  
13 newborn initial clinic visits, follow-up clinic visits, or hospital short-term acute care visits, nor if  
14 the newborn was weaned and discharged home without ventilation. They concluded and insisted  
15 that Kaiser's hospital coding staff should follow and be compliant with official coding guidelines  
16 for the assignment of a respiratory/vent status code.

17 **(B) December 2013**

18 90. During a follow-up phone conference on December 3, 2013 attended by Ms.  
19 Hernandez and members of TPMG's Encounter Information Operations group ("EIO," a TPMG  
20 group that specifically focuses on the Medicare Advantage program and was led at the time by  
21 Director Anne Cadwell), the above coding guidance conclusion was rejected over Ms. Hernandez's  
22 objection and notwithstanding the references provided, including that Ms. Bryant had submitted an  
23 inquiry to AHA Coding Clinic. TPMG stated that it would move forward with capturing vent  
24 dependence status if a hospital newborn was placed on ventilation for at least 12 continuous hours,  
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1 even if the newborn was successfully weaned from the respirator/ventilator and discharged without  
2 a respirator/ventilator.

3           91. The December 3 directive was followed by a call to Ms. Hernandez on  
4 December 4, 2013 from TPMG Director Ms. Cadwell and Dr. Bliss, who focused not on Kaiser's  
5 invalid coding of vent dependence or references provided, but on why Coding Clinic was queried  
6 by Ms. Bryant in the first place. Ms. Hernandez was required to provide Ms. Bryant's cell phone  
7 number so that the TPMG EIO Directors could immediately contact Ms. Bryant once they learned  
8 that she was the one who submitted the Coding Clinic query. Dr. Bliss and Ms. Cadwell called Ms.  
9 Bryant to rebuke and chastise her for submitting a query to Coding Clinic without notifying TPMG.  
10 Both Ms. Hernandez and Ms. Bryant were in Dr. Bliss' "line of fire," and were very distressed. *See*  
11 Exhibit 21.

12           92. Ms. Hernandez and Ms. Bryant were told not to inquire outside Kaiser  
13 anymore on such issues without input and approval from Kaiser's Coding Governance Group  
14 (CGG). They were warned that outside inquiry would create risk for Kaiser. Once again, pressure  
15 and criticism were directed at Ms. Bryant and Ms. Hernandez for not agreeing to TPMG's approach  
16 to capturing this diagnosis.

17           93. On December 8, 2013, Ms. Hernandez was further instructed by TPMG  
18 Clinical Documentation Improvement ("CDI") Physician Director Dr. Shirley Cachola, to "use  
19 'respirator dependence' for patients with tracheal intubation until the specifics are clarified by the  
20 coding clinic .... Not sure this meets compliance since it is not defined but this is how med. group  
21 wishes to proceed for now." Exhibit 22 at REL0000273. Ms. Bryant and Ms. Hernandez believed  
22 this instruction to be clear error and unethical, a sentiment echoed by their colleague in the Regional  
23 HIM group, Dawna Toews, who questioned how the company could proceed "when it is clearly out  
24 of compliance.... I am not inclined to continue working for a company that blatantly ignores  
25 guidelines I have promised to follow, and that put me in jeopardy of losing my professional  
26 licensing." *Id.* at REL0000269.

1           94. Ms. Bryant was directed by TPMG to quickly follow-up on the pending  
2 response from Coding Clinic on the newborn-specific issue of vent dependence coding. On  
3 December 6, 2013, Coding Clinic's Senior Coding Consultant Anita Rapier wrote via email to Ms.  
4 Bryant that "code V46.11 (respirator dependence status) is used to describe patients who have been  
5 dependent on mechanical ventilation over a period of time. It is not used for newborns who are  
6 placed on a vent for a short period." Exhibit 20 at REL0000267.

7           95. Ms. Bryant sent a follow-up email to Anita Rapier as follows: "Thus if a  
8 newborn was placed on a vent for 12 or even 20 hours and then at discharge is NO longer on the  
9 vent, we would not assign the V46.11 status code to that discharge/stay." AHA Coding Clinic's  
10 Senior Coding Consultant Ms. Rapier responded immediately: "Yes, that is my interpretation." *Id.*  
11 at REL0000266. Thus, Coding Clinic corroborated AHIMA's response and Ms. Bryant's and Ms.  
12 Hernandez's original conclusion. Coding Clinic's more formal February 7, 2014 response letter to  
13 Ms. Bryant, quoted above, confirmed its guidance. *See* Exhibit 19.

14           96. Contemporaneously, Ms. Bryant and Ms. Hernandez continued to have deep  
15 concern and investigated Kaiser's coding practices for vent dependence status both inside and  
16 outside of the newborn care context, including for patients in the Medicare Advantage program.  
17 They quickly confirmed that they were similar. TPMG in Kaiser's NCAL region required its CDI  
18 Physician Director Dr. Cachola, CDI Managers, Susan Ingerbretsen and Donna McIvor (under Dr.  
19 Bliss' leadership) to create an acceptable timeline for the capture of vent status code. In Diagnostic  
20 Guidelines published in November 2013, TPMG CDI established a "greater than 30 day" rule for  
21 vent dependence status: that is, if a patient is receiving respiratory support through intubation for  
22 more than 30 days, then vent dependence status should be documented and the code should be  
23 assigned, even if the patient is successfully weaned and discharged without a ventilator. Exhibit 23  
24 (TPMG Neonatal Intensive Care Unit Diagnostic Guidelines), at REL0001005.

25           97. Similarly, in Kaiser's SCAL region, SCPMG's regional CDI program  
26 established a 21-day duration of care to constitute vent dependence. Exhibit 24 (HIX Neonatology  
27 Documentation and Coding 2014), at REL0001040.

1           98.     The RRG meetings that Ms. Bryant attended often included the capture of  
2 specific HCCs, and ventilation status was included on numerous occasions. Kaiser promoted the  
3 documentation and capture of the respirator/ventilator dependence code (HCC 82) in education  
4 sessions and materials to Kaiser physicians throughout the Kaiser regions. In this way, Kaiser's  
5 improper practice for coding the ventilation status code was migrated systemically throughout the  
6 Kaiser regions and adopted by all of Kaiser's Permanente Medical Groups, notwithstanding the  
7 coding guidance from Coding Clinic and AHIMA.

8                   **(iv)     Impact of Kaiser's vent dependence practices**

9           99.     Kaiser data compiled by Ms. Bryant through her national coding quality  
10 monitoring work establishes that the Vent Dependence status code is or was being captured  
11 frequently by Kaiser. Medicare Advantage and HHS-HCC payer data specifically indicated a high  
12 volume of these codes, particularly in Kaiser's NCAL and SCAL regions. *See Exhibit 25* and  
13 *Exhibit 18*.

14           100.    The coding data includes a high volume of cases in which patients were  
15 successfully weaned from ventilation and routinely discharged home or to self-care, including after  
16 just a day or two in the hospital. *See id.*; *Exhibit 26* (showing NCAL vent dependence cases). In a  
17 December 2013 validation audit, Ms. Hernandez and her NCAL audit team concluded that 100% of  
18 a sample of TPMG vent dependence cases were invalid. *See Exhibit 27*.

19           101.    Data from all Kaiser Regions confirms that the vent dependence coding  
20 volume skyrocketed across Kaiser. *See Exhibit 28* (Kaiser data gathered by Ms. Bryant). *See also*  
21 *Exhibit 18* (includes vent dependence (HCC 82) data submitted by Kaiser to the Medicare  
22 Advantage program from January, 2014 through April, 2016).

23           102.    Kaiser cannot articulate or produce any clinical research, standards or  
24 evidence-based medical justification for coding vent dependence status once a patient has been  
25 ventilated and removed after a set number of days; for coding vent dependence status even when  
26 ventilation is used for far fewer days than the purported thresholds; or for setting different policies  
27 for determining ventilation dependence status within the various Kaiser regions.

1           103. Ms. Bryant and Ms. Hernandez further believe and therefore allege that  
2 Kaiser's proprietary, diagnoses electronic "pick list" was being utilized by Kaiser to easily and  
3 falsely capture this inaccurate status code in all clinical settings. Moreover, they believe and  
4 therefore allege that Kaiser has never gone back to validate the coding to identify incorrect codes,  
5 and has never repaid, restated, or otherwise reimbursed amounts falsely obtained during this period  
6 from over-diagnosing and over-coding vent dependence status. To their knowledge, there has been  
7 no validation or discussion for rebilling or resubmission of corrected claims or data.

8 **II. "THE KAISER WAY" IGNORES ESTABLISHED PROCEDURE, INCENTIVIZES**  
9 **GREED, AND CULTIVATES FRAUD**

10           104. At every level and across regions, Kaiser is driven by a corporate culture that  
11 demands and rewards financial success from its employees. Kaiser's senior management pushes  
12 relentlessly to increase Kaiser's revenue from risk adjustment. The risk adjustment practices  
13 described in this Complaint are attributable in large part to these demands and rewards. Ms. Bryant  
14 and Ms. Hernandez have witnessed Kaiser's profit-seeking and financial-gaming culture corrode its  
15 compliance function over many years, leading to the frauds described herein on the government and  
16 its Medicare and Medicaid programs.

17 **A. Kaiser's policies and procedures**

18           105. Kaiser consistently publishes and enforces internal company policies and  
19 procedures that contravene coding and diagnostic principles that are widely accepted and enforced  
20 within the broader coding community. To avoid detection, Kaiser sometimes labels its instructional  
21 documents as "Program Advisories" rather than "policies" in order to circumvent the implications  
22 of imposing an improper requirement. But these Advisories are not optional and are enforced like  
23 any other policy and procedure within Kaiser.

24           106. Many of Kaiser's proprietary policies regarding diagnosing and coding are  
25 intentionally constructed to be less restrictive than the norm in furtherance of the company's  
26 emphasis on profit over compliance. These departures from accepted policy and procedure lead  
27 directly to improper documentation, coding and overbilling. Kaiser's Permanente Medical Groups  
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1 and Kaiser's Medicare Finance Department initiate and lead this corporate culture, focusing on  
2 capturing higher reimbursement without any contravening focus on the avoidance of overbilling.

3           107. Kaiser's National Compliance Office is ineffective, apprehensive, and slow  
4 in investigating and responding to documentation and coding compliance issues. In addition, NCO  
5 coding leadership has openly admitted to Ms. Hernandez that the Permanente Medical Groups have  
6 significant control over chart audit selection, accuracy rates, documentation guidance, coding policy  
7 and practices, all to manipulate the capture of more HCC codes and to increase government payer  
8 reimbursement. Instead of turning to NCO, the Permanente Medical Groups asked "Medical Group  
9 Regional Compliance" staff for advice about who can be manipulated easily within the region to get  
10 the desired result (*e.g.*, more HCC target capture). When NCO completes an internal audit that  
11 shows inaccurate or misleading documentation or coding, NCO is pressured and intimidated by the  
12 relevant Regional PMG to change the audit's accuracy results.

13           108. On a system-wide basis, Kaiser has been reluctant to perform historical code  
14 correction and billing submission when a problem or issue has been identified that should be  
15 rebilled. The culture at Kaiser perpetuates a superiority, manipulation, and intimidation by  
16 physician medical group leaders and medical group management, resulting in an inability to  
17 challenge or present a different perspective, even when backed by express, unambiguous coding  
18 guidelines, standards or HIM coding expertise, without being chastised, threatened and ridiculed.

19           **(i) Query templates**

20           109. Coding professionals are permitted under AHIMA's Standards of Ethical  
21 Coding to query physicians/providers for clarification and additional documentation prior to code  
22 assignment when there is conflicting, incomplete, or ambiguous information in the health record  
23 regarding a significant reportable condition or procedure or other reportable data element dependent  
24 on health record documentation. Querying physicians/providers is also permitted after billing (*e.g.*,  
25 retrospectively) if performed in a timely manner.

26           110. But these Standards, as well as AHIMA's Guidelines for Achieving a  
27 Compliant Query Practice and AHIMA's Managing an Effective Query Process Practice Brief,  
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1 forbid coding professionals and others (e.g., clinical staff, physicians, nursing staff, etc.) who query  
2 from "leading" providers to select a particular diagnosis. *See Exhibit 29.*

3 111. According to AHIMA's Managing an Effective Query Practice Brief,  
4 "Queries that appear to lead the provider to document a particular response could result in allegations  
5 of inappropriate upcoding. The query format should not sound presumptive, directing, prodding,  
6 probing, or as though the provider is being led to make an assumption." *Exhibit 30* at REL0000511.

7 112. In *Health Information Management Compliance: A Model Program for*  
8 *Healthcare Organizations*, AHIMA's Sue Bowman writes that "Communication tools between  
9 coding personnel and physicians, such as coding summary sheets, attestation forms, or coding  
10 clarification forms (e.g., physician query forms), should never be used as a substitute for appropriate  
11 physician documentation in the health record."

12 113. Nevertheless, some of the Kaiser regions developed sets of query "templates"  
13 for clinical documentation improvement (CDI) staff for specific HCC diagnoses to use in concurrent  
14 querying of providers that do just that. These improper query templates were used in at least Kaiser's  
15 NCAL hospital CDI and Northwest CDI, and perhaps others. There is a cultural reluctance within  
16 NCO to give direction and/or require the Kaiser Regions to utilize the Kaiser standard query form  
17 language for coding and CDI.

18 114. The hospital coding staff also utilizes templated physician queries, but these  
19 query templates are reviewed and constructed to ensure non-leading language for a variety of  
20 diagnoses, regardless of payer type or reimbursement impact. Most of the query reviews of language  
21 utilized were under the oversight of Ms. Bryant and guidance of Ms. Hernandez, always utilizing,  
22 communicating, and applying the AHIMA direction, guidance and practice briefs.

23 115. KP NCAL and Northwest CDI query templates developed by TPMG and the  
24 Northwest PMG, respectively, many of which involve diagnoses directly linked to HCCs under the  
25 Medicare Advantage program and HHS-HCCs under the Affordable Care Act, are designed to be,  
26 and are in fact, leading. Through the queries, CDI staff introduce clinical indicators for specific  
27 HCC diagnoses to the providers, who in turn routinely follow the suggestion to add a reimbursable  
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1 diagnosis where none existed and should not have been added. In Kaiser's NCAL Region, the CDI  
2 queries are not made an official permanent part of the record while HIM coding queries are, thus  
3 obscuring the role of CDI and improper querying from review.

4 116. Although the role of CDI staff is to seek clarification from providers for  
5 documentation for specific clinical indicators, there has been inconsistent application of the Practice  
6 Brief Guidance at Kaiser. These queries are always, or almost always, directed toward an HCC  
7 diagnosis for maximizing reimbursement capture and not for overall quality documentation for all  
8 clinical situations, all payers, and all patients. In fact, Ms. Bryant recalls on several occasions a  
9 stated reluctance from Kaiser's Revenue Cycle leaders to look at documentation and coding both  
10 ways – *e.g.*, for both over- and under coding – on the basis that it is too costly and time consuming.  
11 Moreover, Kaiser's CDI program is not a "payer agnostic" approach. TPMG in Kaiser's NCAL  
12 Region, for example, limits its CDI focus to HCCs only and never expanded to examine severity of  
13 illness (SOI) and risk of mortality (ROM) to all patients and to all payers, notwithstanding Ms.  
14 Bryant's strong recommendations,

15 117. Examples of the leading query templates include Kaiser's templates for:  
16 obesity/extreme or morbid obesity; protein calorie malnutrition (mild/moderate/severe); pressure  
17 ulcer; neoplasm (history versus current); emphysema; depression; adrenal mass; aortic  
18 atherosclerosis; diabetes manifestations; neutropenia; sepsis/SIRS with organ dysfunction, and  
19 others. *See Exhibit 31* (improper query templates from Kaiser's Northwest region, operated by the  
20 Northwest PMG); *Exhibit 32* (TPMG CDI Tip Sheet).

21 118. Moreover, certain query templates in Kaiser's Northwest Region developed  
22 by the Northwest PMG include leading language introducing a diagnosis to the physician, and not  
23 including options of "unknown," "other," "clinically undetermined" or "unspecified." They  
24 contravene AHIMA's guidance on Achieving a Compliant Query Process, which states that  
25 *"Multiple choice query formats should include clinically significant and reasonable options as*  
26 *supported by clinical indicators in the health record, recognizing that there may be only one*  
27 *reasonable option....Multiple choice query formats should also include additional options such as*  
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1 *'clinically undetermined' and 'other' that would allow the provider to add free text. Additional*  
2 *options such as 'not clinically significant' and 'integral to' may be included on the query form if*  
3 *appropriate."*

4 **(ii) Inquiries to AHA Coding Clinic**

5 119. As discussed above in the Vent Dependence Status section, Kaiser chastised  
6 and reprimanded Ms. Bryant, Ms. Hernandez and other HIM coding professionals for submitting  
7 coding questions directly to the American Hospital Association Central Office for Coding Clinic, a  
8 routine and standard of practice for coding professionals across the country. Ultimately, Kaiser  
9 instituted and mandated requirements for all AHA Coding Clinic questions, routing them through a  
10 rigorous review committee comprised primarily of non-coding professionals and many layers of  
11 approval process before submission.

12 120. Ms. Bryant was directed that any and all coding questions must go through  
13 Kaiser's own Coding Governance Group ("CGG"), a group that was and is composed of a majority  
14 of physicians and representatives from Kaiser's Permanente Medical Groups rather than coding  
15 professionals. In December 2013, Ms. Bryant was told by Kaiser TPMG's senior physician lead Dr.  
16 Bliss that she was "putting the organization at risk" by submitting questions directly to Coding  
17 Clinic, a sentiment echoed by TPMG Director Anne Cadwell on a call that also included many  
18 regional physicians and Revenue Cycle leaders. Ms. Bryant's expertise, professional knowledge  
19 and career-long practice of submitting questions to Coding Clinic were thus called into question.  
20 Ms. Bryant commented to the group that it was her duty and responsibility as a coding professional,  
21 and a standard of practice, to submit questions for coding clarification to AHA Coding Clinic  
22 without a committee review.

23 121. Ms. Bryant expressed concern on the December 2013 call that this internal  
24 group lacked coding expertise, and inserted a layer of bureaucracy in an area where Kaiser's National  
25 Coding group (led by Ms. Bryant) should have independence and the ability to send unattributed  
26 questions to Coding Clinic. Her protests and professional rationale were ignored.

1           122. Ms. Bryant reported back to Kaiser's NCAL HIM leadership, including Ms.  
2 Hernandez and Dawna Toews, regarding this new directive. Her staff was appalled with the  
3 outcome of the meeting and felt that their credentials were at risk due to being prohibited from  
4 following ethical coding practices to seek and comply with official coding guidelines. *See Exhibit*  
5 22. Under extreme pressure, Ms. Bryant reluctantly complied with the CGG request and worked  
6 with NCO's Nancy Andersen to develop a coding questions workflow over the coming years (started  
7 in 2014 and finalized in 2015, currently still under revision in 2017).

8           123. The internal coding question workflow for submitting coding questions to  
9 Coding Clinic was discussed during a March/April 2015 conference call/meeting involving NCO's  
10 Diana Medal, Nancy Andersen, Ms. Bryant and Ms. Hernandez. The group specifically discussed  
11 the restrictive and controlling nature of the CGG directive and how the physician members of the  
12 CGG were extremely apprehensive of Ms. Bryant sending questions to Coding Clinic due to their  
13 concern that Coding Clinic's response might force Kaiser to change its HCC documentation and  
14 HCC capture practices.

15           124. NCO's Nancy Andersen mentioned that the CGG physician leader, Dr.  
16 Annette Guido, was behind the restriction that had been imposed and that she (Ms. Andersen) did  
17 not entirely agree with it, but that the physicians' directive had to be followed. Ms. Bryant stated  
18 her concerns with the CGG being composed mostly of physicians and not coding experts, a point  
19 with which Ms. Andersen agreed. On the same call, Ms. Hernandez discussed her concern that  
20 TPMG had been focusing on HCCs and had restricted her in the past from collaborating outside  
21 TPMG EIO (*i.e.*, with Ms. Bryant, Ms. Anderson and NCO), much less submit a question to Coding  
22 Clinic, and felt that TPMG feared that the Coding Clinic response or guidance would derail its  
23 capture efforts of HCC diagnoses. Ms. Andersen stated that she understood but "we have no  
24 choice." She stated that it was difficult to get the medical groups and CGG to understand the need  
25 to query AHA Coding Clinic directly and freely.

26           125. When Ms. Hernandez requested a copy of the recording of the conference  
27 call several days later, Ms. Medal stated via email that it had been deleted per the instructions of  
28

1 Ms. Andersen. Ms. Bryant and Ms. Hernandez believe that the recording was deleted due to the  
2 fact that many comments were made during the call, including by NCO leadership, that were highly  
3 critical of CGG's and TPMG's leadership and practices.

4 **B. Kaiser's emphasis on financial outcomes**

5 126. At every level of the company, Kaiser emphasizes financial results over  
6 compliance and accuracy, bending the rules and utilizing gaming strategies to falsely engineer  
7 profits.

8 **(i) CDI program and related activities.**

9 127. In late 2009, Kaiser NCAL Revenue Cycle developed its "Clinical  
10 Documentation Improvement" program, which it called "Clinical Documentation Integrity" or  
11 "CDI," to ostensibly improve its clinical documentation of hospital inpatient medical encounters.  
12 This effort was followed by the SCAL and Northwest Regions in the hospital setting. In actuality,  
13 Kaiser's CDI programs strive only to improve clinical documentation insofar as it increases HCC  
14 capture and Medicare and HHS reimbursement.

15 128. AHIMA's guidance on CDI programs provides that they are required to  
16 address all payers, not just Medicare. In addition, CDI programs should not focus solely on  
17 reimbursement. In furtherance of this guidance, the original NCAL CDI program initially developed  
18 by Ms. Bryant in 2009 was designed to achieve a payer-agnostic focus by the end of a three-year  
19 plan. But Kaiser's CDI program, in practice, has diverged from Ms. Bryant's expertise and design  
20 and is definitively not "payer agnostic." It focuses almost exclusively on risk-adjusted payers, such  
21 as HHS under the ACA program and CMS under the Medicare Advantage program, and only on  
22 documentation impacting HCCs.

23 129. Ms. Bryant made several requests to expand Kaiser's CDI program to other  
24 payers and not to focus solely on HCC reimbursement, but was not successful. In approximately  
25 late 2010, Kaiser NCAL Revenue Cycle Vice President Dave Nyburg moved the CDI Program from  
26 Ms. Bryant's oversight to his direct oversight. Ms. Bryant believes that this move was made due to  
27  
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1 ongoing TPMG discomfort with the direction she wanted to move the program and the pressure and  
2 resistance to Ms. Bryant's advice and guidance.

3 130. Moreover, in the past, Kaiser's CDI program conducted its concurrent  
4 documentation reviews by going into prior or old encounters and pulling diagnostic and clinical  
5 information to query physicians for the current encounter for HCC diagnosis capture. Again, this  
6 contravenes coding guidelines and AHIMA Standards of Ethical Coding under section 4.5: Coding  
7 professionals shall not "*Utilize health record documentation from or in other encounters to generate*  
8 *a provider query.*" See Exhibit 29.

9 131. For example, Ms. Hernandez received multiple inquiries from CDI leadership  
10 and CDI nursing staff as to whether they may use old lab values, clinical indicators and  
11 documentation from previous encounters and apply these to send a query about a different, current  
12 encounter. Ms. Hernandez has repeatedly told CDI leadership staff that this is not appropriate. But  
13 the repeated nature of the inquiries gave rise to Ms. Hernandez's belief that the CDI program was  
14 routinely looking backwards; it was highly unlikely that the CDI leadership was getting to every  
15 instance and every CDI employee to provide Ms. Hernandez's guidance.

16 132. For many years, Kaiser's CDI program, especially in the NCAL region, has  
17 consistently expressed the value of its work in terms of additional dollars captured, not in improved  
18 quality of care, patient safety, severity of illness, improved mortality scores, compliant  
19 documentation, or outcomes.

20 133. For example, in a July 2010 NCAL presentation "CDI Prioritization for Roll  
21 Out," Kaiser's NCAL CDI group analyzed the results of an internal audit of inpatient "HCC  
22 underpayment." The presentation quantified the impact of the HCC codes that had been  
23 "recaptured" in the audit in terms of how much additional revenue that meant for the company. The  
24 presentation did not mention compliance or identify any HCC overpayment. See Exhibit 33.

25 134. In a Kaiser NCAL "CDI Program: Update" presentation in December 2011,  
26 the company emphasized in its Key Findings that the program had generated year-to-date 2011  
27 revenue of "\$27.80 million." See Exhibit 11. The presentation even quantified the "Top CDI  
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1 Queries" by HCC in terms of the "Revenue Impact" to the company. CDI Program Updates have  
2 followed the same format and included these same metrics for many years.

3 **(ii) Kaiser's RRG meetings and Regional Competitions for Revenue/HCC**  
4 **Capture.**

5 135. In approximately 2008-2009, Kaiser formed Regional Reporting Group  
6 ("RRG"), comprised of senior personnel from the Health Plan, Permanente Medical Groups and  
7 Revenue Cycle of each region with the focus of Medicare Advantage Finance Risk Adjustment.  
8 The RRG meetings were initially led by Dr. Simon Cohn until his retirement in 2015, after which  
9 the RRG was led by Dr. Annette Guido of Kaiser's Northwest Region, along with Hovannes Daniels,  
10 Kaiser's Medicare Finance VP under Kaiser's Health Plan.

11 136. The RRG meets regularly to share regional "best practices" on how to capture  
12 more HCC conditions, diagnoses, and codes, and thus to increase Kaiser revenue. This was and is  
13 the top focus of these high-level meetings. Other topics discussed are risk scores and Risk-  
14 Adjustment Data Validation (RADV) audits, regulatory changes, comparing regions to each other,  
15 and reviewing financial and HCC targets.

16 137. "Best practices" often contain improper and inaccurate querying,  
17 documentation, and coding practices. Certain HCC conditions and diagnoses are specifically  
18 targeted at the RRG meetings for their financial impact and discussed and compared with the other  
19 regions. Ms. Bryant recalls a RRG meeting where a regional physician leader made a presentation  
20 which contained inaccurate documentation and coding information. Ms. Bryant took her concerns  
21 about the presentation to Janet D. Franklin of Kaiser's NCO. Ms. Franklin agreed that Ms. Bryant  
22 was correct but said that that they could not say anything here at the RRG meeting in front of the  
23 Permanente Medical Groups. Ms. Bryant told Janet Franklin that she was concerned with that  
24 approach in that there was a large audience in many regions who would think that the presentation  
25 had correct information. Ms. Franklin agreed, but said that there was nothing that could be done.

26 138. Kaiser's various regions, including especially its NCAL (TPMG) and  
27 Southern California regions (SCPMG), compete with each other on which region manages to  
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1 capture the highest number of HCCs and improved risk scores. Monthly or Bi-monthly WebEx  
2 meetings and report outs are generated showing the results of the risk-adjustment metrics, as well  
3 as goals and targets for regional HCC capture over the next period. In addition, the regions compete  
4 in the third and fourth fiscal quarters each year as to their metrics on capturing chronic conditions  
5 and HCCs, and improving scores and revenue, metrics which are also discussed and presented at  
6 RGG meetings.

7 **(iii) Employee and management bonuses.**

8 139. Ms. Bryant and Ms. Hernandez believe and therefore allege that Kaiser's  
9 NCAL region, including TPMG, gives bonuses to employees and leadership near year-end that are  
10 tied to the overall financial goals and success of the Kaiser region. They therefore believe and allege  
11 from their experience working in TPMG that bonuses are related, directly or indirectly, to HCC and  
12 revenue capture.

13 **(iv) Kaiser's regional medical groups dominate over Kaiser's compliance  
14 function.**

15 140. In June 2013, Nancy Andersen, Kaiser's National Compliance manager, told  
16 Ms. Hernandez that the regional Permanente Medical Groups choose what and how to be audited.  
17 She told Ms. Hernandez that "she knows where the bodies are buried," but that the National  
18 Compliance Office has no power over the Permanente Medical Groups. This is exactly the opposite  
19 of how the compliance function should operate in a compliant organization. In 2016, Ms. Andersen  
20 confirmed to Ms. Bryant that Kaiser's Permanente Medical Groups continue to be "rabid for HCCs"  
21 and that Kaiser's NCO group has no power to focus the organization on compliance.

22 **C. Kaiser improperly employs technology to further its HCC and revenue capture.**

23 **(i) Data mining.**

24 141. In 2014-2015, Kaiser's TPMG EIO's "data mining" team, comprised largely  
25 of out-of-country doctors, used "algorithms" in the NCAL region to identify and capture possible  
26 missed HCCs to create "add files," referred to as "missed opportunities" by TPMG. Ms. Hernandez  
27 believes and therefore alleges that this practice had been going on for many years.

1           142. Also in 2014-2015, Ms. Hernandez witnessed TPMG utilizing foreign  
2 doctors, who were not licensed as physicians in the United States and may not have had current  
3 foreign licenses, to access the clinic encounters. The foreign doctors would send "Dear Doctor"  
4 notes via KP Health Connect to the primary care physician asking them to add to (addend) the  
5 medical records with HCC diagnoses based on their reviews and using their algorithms, often several  
6 months after the encounter.

7           143. This process was improper and led to HCC payment errors. For example, as  
8 part of an NCO audit in 2015, Ms. Hernandez found documentation of sepsis added onto a clinic  
9 encounter four months after the patient was seen, with no supporting documentation as to how the  
10 HCC diagnosis was determined (*e.g.*, no lab values, signs/symptoms, treatment, clinical indicators,  
11 etc.). When Ms. Hernandez shared with her director, Anne Cadwell (TPMG EIO Director), that  
12 Ms. Hernandez agreed with NCO's finding that sepsis was improperly coded, Ms. Hernandez was  
13 told by Ms. Cadwell "never to agree" with an NCO audit, and if the topic came up, to just say "thank  
14 you." Ms. Hernandez asked what to enter in the audit response, given that she agreed with the  
15 finding. Ms. Cadwell instructed Ms. Hernandez not to talk at the audit exit call and to only speak  
16 when Ms. Cadwell asked Ms. Hernandez to say something.

17           **(ii) Improper Carry-Over From Prior Years.**

18           144. In 2014-2015, Ms. Hernandez discovered that in Kaiser's NCAL TPMG  
19 region, Kaiser's "Business Intelligence Team" ("BIT") generated questionable "block" files and  
20 "add" files for resubmission to CMS based on algorithms. The addenda process they used may have  
21 improperly carried over HCCs from previous years to the current year without physician validation  
22 or a face-to-face encounter.

23           145. Ms. Hernandez was part of the TPMG EIO Director email distribution list  
24 where medical record diagnoses files were emailed to the directors asking for approval for "add" or  
25 "block" files, which Ms. Hernandez never approved. To Ms. Hernandez' knowledge, "add" (or  
26 "addenda") files were created based on algorithms run by the BIT team (*e.g.*, diabetes with  
27 manifestations, etc.), and automatically carried from the previous year to the current year's problem  
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1 list even where patients were not seen face-to-face as required under the Medicare Advantage  
2 program.

3 **(iii) Computer Assisted Coding**

4 146. Computer Assisted Coding (CAC) is a natural language processing  
5 technology utilized as a tool to assist the coding professional to confirm and select ICD and CPT  
6 codes based on words and language used in the medical record. CAC identifies wording and/or full  
7 sentences within the electronic health record which contains signs, symptoms, diagnoses and  
8 procedures for which a code may possibly be assigned once confirmed and validated by the coding  
9 professional. CAC was identified and implemented by Kaiser as a valuable tool and asset to increase  
10 coding productivity, coding accuracy, and HCC capture.

11 147. In approximately 2013, during the pilot phase of CAC implementation in  
12 Kaiser's NCAL region, Ms. Hernandez conducted auditing and validation of the resulting diagnoses  
13 and codes, along with Ms. Sheryl Roy (Regional NCAL HIM employee at the time). Ms. Hernandez  
14 and Ms. Roy determined that CAC was capturing and overcoding diagnoses with an overall poor  
15 accuracy rate (60% or less). They shared their findings with Ms. Bryant, who agreed with their  
16 concerns.

17 148. During a CAC quality assurance meeting, which was held via recorded  
18 webex, Ms. Bryant, Ms. Hernandez and Ms. Roy reported their audit findings and concerns to  
19 NCAL Revenue Cycle Charge Capture Manager, Gina Sandler, and Revenue Cycle Integrity  
20 Director, Diane Ott, who were members of Kaiser's CAC implementation team. Ms. Sandler typed  
21 meeting minutes during the call. Ms. Hernandez and Ms. Roy later discovered that the audit results  
22 and their concerns had been excluded from the meeting minutes. Moreover, they discovered that  
23 Ms. Sandler and Ms. Ott had manipulated the actual audit results to indicate a higher accuracy rate.  
24 Ms. Hernandez and Ms. Bryant believe and therefore allege that the audit results were manipulated  
25 and their concerns were ignored so as to avoid identification of any problems with CAC which might  
26 delay its full implementation at Kaiser. Ms. Bryant and Ms. Hernandez voiced their concerns to  
27  
28

1 NCAL Revenue Cycle Leadership and to Kaiser's NCO leadership (Ms. Anderson), but were  
2 ignored.

3 149. Ultimately, Kaiser's CAC implementation moved forward in 2014 on  
4 outpatient and inpatient encounters. After 18 months to two years of constant problems with CAC,  
5 the hospital coding and auditing staff expressed outrage with the continued inaccuracy and their  
6 mistrust of the CAC tool. These complaints resulted in NCAL Revenue Cycle Leadership finally  
7 discontinuing CAC in hospital outpatient encounters in 2016.

8 150. Ms. Bryant and Ms. Hernandez believe and therefore allege that Kaiser never  
9 went back to correct the many inaccurate codes generated by the Kaiser's flawed CAC processes.

10 **D. The Kaiser Defendants Acted With Intent.**

11 151. The Kaiser Defendants acted with intent in over-charging the United States  
12 and retaining and failing to return such overpayments. Kaiser's entire corporate culture is built  
13 around "mining for", "gaming" and "capturing" codes even when they are not validly supported or  
14 documented, training its physicians to over-diagnose and falsely document diagnoses, elevating its  
15 profits over its compliance function, and motivating employees through the setting of metrics and,  
16 upon information and belief, utilizing bonuses for successful code and revenue capture. The specific  
17 schemes described above engineered by Kaiser regarding aortic atherosclerosis, vent dependent  
18 status, and others evidence Kaiser's intentional, systematic efforts to circumvent proper  
19 documentation and coding practices and Medicare law. Moreover, although Kaiser has a National  
20 Compliance Office with hundreds of staff, there are huge holes and gaps in the effectiveness of its  
21 compliance program, which is subverted to the profit goals of Kaiser's medical groups.

22 **E. Kaiser's Fraud Was and Is Material to the Government's Payment Decision**

23 152. The United States, unaware of the falsity of the records, statements, and  
24 claims made and submitted by Defendants, its agents, employees, and co-conspirators, and as a  
25 result thereof, has paid money that it otherwise would not have paid. For example, CMS would  
26 have refused to make risk adjustment payments, in whole or in part, to the Kaiser Defendants if it  
27 had known that the Kaiser Defendants were falsifying documentation and coding as alleged in this  
28

1 Complaint. The fraudulent diagnostic data and coding submitted by the Kaiser Defendants  
2 constituted a substantial portion of all of the diagnostic data and coding submitted by the Kaiser  
3 Defendants to the government. Given that diagnostic data and coding is the sole determinant in the  
4 calculation of any risk adjustment payment based on a beneficiary's health status, the government's  
5 payment decision necessarily would have been different had the government known that the data  
6 and coding were false.

7           153. Moreover, CMS makes reconciliation payments to the Kaiser Defendants  
8 based on the diagnostic data submitted. Those payments are adjusted to account for invalid  
9 diagnoses codes that providers such as Kaiser submit. If the Kaiser Defendants had complied with  
10 their obligation to delete invalid diagnoses from RAPS, Medicare would have processed the  
11 corrected data, recalculated the risk score for the beneficiaries, and the risk adjustment reconciliation  
12 payment system would have made the corresponding payment adjustment. But when the Kaiser  
13 Defendants did not delete invalid diagnoses from RAPS, Medicare paid for the invalid diagnoses as  
14 part of its final reconciliation payment to the Kaiser Defendants. If the Kaiser Defendants had  
15 corrected their invalid diagnoses, CMS would have processed the corrected data to produce accurate  
16 risk scores for beneficiaries, which necessarily would have changed the risk adjustment payments  
17 for those beneficiaries.

18           154. The risk adjustment attestations submitted by the Kaiser Defendants each  
19 year are a reminder to the Kaiser Defendants of their obligation to submit valid data and to promptly  
20 correct invalid data. They also have a direct impact on the government's risk adjustment payments.  
21 For example, if CMS knew that the Kaiser Defendants' attestations were false, CMS's risk  
22 adjustment payments would have changed in that CMS would have refused to make risk adjustment  
23 payments to the Kaiser Defendants, in whole or in part.

24           155. The materiality of the Kaiser Defendants' fraud is further established by the  
25 fact that the United States has filed suit against Kaiser in this case and against other managed care  
26 organizations over similar documentation and coding fraud as alleged herein.

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1 **FIRST CLAIM FOR RELIEF**

2 **False Claims Act: Presentation of False or Fraudulent Claims**

3 **U.S.C. § 3729(a)(1)(A) (formerly 31 U.S.C. § 3729(a)(1))**

4 156. The Relators repeat and re-allege the allegations contained in Paragraphs 1 –  
5 208 above as though they are fully set forth herein.

6 157. Defendants violated 31 U.S.C. § 3729(a)(1)(A) as follows: Defendants  
7 knowingly (as "knowingly" is defined by 31 U.S.C. 3729(b)(1)) presented or caused to be presented  
8 a false or fraudulent claim for payment or approval. Specifically, Defendants knowingly presented  
9 or caused to be presented a false or fraudulent Risk Adjustment Attestation to the United States in  
10 order to receive and retain risk adjustment payments from the Medicare Program.

11 158. Defendants violated former 31 U.S.C. § 3729(a)(1) as follows: Defendants  
12 knowingly presented, or caused to be presented, to the United States a false or fraudulent claim for  
13 payment or approval. Specifically, Defendants knowingly presented or caused to be presented a  
14 false or fraudulent Risk Adjustment Attestation to the United States in order to receive and retain  
15 risk adjustment payments from the Medicare Program.

16 159. The United States, unaware of the falsity of the records, statements, and  
17 claims made and submitted by Defendants, its agents, employees, and co-conspirators, and as a  
18 result thereof, paid money that it otherwise would not have paid.

19 160. By virtue of the said false or fraudulent claim, the United States incurred  
20 damages and therefore is entitled to multiple damages under the False Claims Act, plus a civil  
21 penalty for each violation of the Act.

22 **SECOND CLAIM FOR RELIEF**

23 **False Claims Act: Making or Using False Records or Statements**

24 **U.S.C. § 3729(a)(1)(B) (formerly 31 U.S.C. § 3729(a)(2))**

25 161. The Relators repeat and re-allege the allegations contained in Paragraphs 1 –  
26 213 above as though they are fully set forth herein.

1 162. Defendants violated 31 U.S.C. § 3729(a)(1)(B) as follows: Defendants  
2 knowingly (as "knowingly" is defined by 31 U.S.C. § 3729(b)(1)) made, used, or caused to be made  
3 or used, a false record or statement material to a false or fraudulent claim. Specifically, Defendants  
4 knowingly made, used, or caused to be made or used a false Risk Adjustment Attestation material  
5 to a false or fraudulent claim for risk adjustment payments from the Medicare Program.

6 163. Defendants violated former 31 U.S.C. § 3729(a)(2) as follows: Defendants  
7 knowingly made, used, or caused to be made or used, a false record or statement to get a false or  
8 fraudulent claim paid or approved by the United States. Specifically, Defendants knowingly made,  
9 used, or caused to be made or used a false Risk Adjustment Attestation to get a false or fraudulent  
10 claim for risk adjustment payments paid or approved by the Medicare Program.

11 164. The United States, unaware of the falsity of the records, statements, and  
12 claims made and submitted by Defendants, its agents, employees, and co-conspirators, and as a  
13 result thereof, paid money that it otherwise would not have paid.

14 165. By virtue of the said false record or statement, the United States incurred  
15 damages and therefore is entitled to multiple damages under the False Claims Act, plus a civil  
16 penalty for each violation of the Act.

17 **THIRD CLAIM FOR RELIEF**

18 **False Claims Act: Conspiracy**

19 **U.S.C. § 3729(a)(1)(C) (formerly 31 U.S.C. § 3729(a)(3))**

20 166. The Relators repeat and re-allege the allegations contained in Paragraphs 1 –  
21 218 above as though they are fully set forth herein.

22 167. Defendants violated 31 U.S.C. § 3729(a)(1)(C) as follows: Defendants  
23 conspired with one another to commit a violation of 31 U.S.C. § 3729(a)(1)(A), (B), and/or (G), as  
24 those violations are specifically alleged in Claims I, II, and IV of this Complaint.

25 168. Defendants violated former 31 U.S.C. § 3729(a)(3) as follows: Defendants  
26 conspired with one another to defraud the United States by getting a false or fraudulent claim  
27 allowed or paid. Specifically, Defendants conspired with one another to defraud the United States  
28

1 by getting risk adjustment payments from the Medicare Program based on a false or fraudulent claim  
2 for risk adjustment payments and/or a false or fraudulent Risk Adjustment Attestation.

3 169. The United States, unaware of the falsity of the records, statements, and  
4 claims made and submitted by Defendants, its agents, employees, and co-conspirators, and as a  
5 result thereof, paid money that it otherwise would not have paid.

6 170. By virtue of the said conspiracy, the United States incurred damages and  
7 therefore is entitled to multiple damages under the False Claims Act, plus a civil penalty for each  
8 violation of the Act.

9 **FOURTH CLAIM FOR RELIEF**

10 **False Claims Act: Reverse False Claims**

11 **U.S.C. § 3729(a)(1)(G) (formerly 31 U.S.C. § 3729(a)(7))**

12 171. The Relators repeat and re-allege the allegations contained in Paragraphs 1 –  
13 223 above as though they are fully set forth herein.

14 172. Defendants violated 31 U.S.C. § 3729(a)(1)(G) as follows: Defendants  
15 knowingly (as "knowingly" is defined by 31 U.S.C. § 3729(b)(1)) made, used, or caused to be made  
16 or used, a false record or statement material to an obligation to pay or transmit money or property  
17 to the United States. Specifically, Defendants knowingly made, used, or caused to be made or used  
18 a false Risk Adjustment Attestation material to an obligation to repay risk adjustment payments to  
19 which they were not entitled from the Medicare Program.

20 173. Defendants also violated 31 U.S.C. § 3729(a)(1)(G) as follows: Defendants  
21 knowingly (as "knowingly" is defined by 31 U.S.C. § 3729(b)(1)) concealed or improperly avoided  
22 or decreased an obligation to pay or transmit money or property to the United States. Specifically,  
23 Defendants knowingly concealed or improperly avoided or decreased an obligation to repay risk  
24 adjustment payments to which they were not entitled from the Medicare Program.

25 174. Defendants violated former 31 U.S.C. § 3729(a)(7) as follows: Defendants  
26 knowingly (as "knowingly" is defined by 31 U.S.C. § 3729(b)(1)) made, used, or caused to be made  
27 or used, a false record or statement to conceal, avoid or decrease an obligation to pay or transmit  
28

1 money or property to the United States. Specifically, Defendants knowingly made, used, or caused  
2 to be made or used, a false Risk Adjustment Attestation to conceal, avoid or decrease an obligation  
3 to repay risk adjustment payments to which they were not entitled from the Medicare Program.

4 175. The United States, unaware of the falsity of the records, statements, and  
5 claims made and submitted by Defendants, its agents, employees, and co-conspirators, and as a  
6 result thereof, paid money that it otherwise would not have paid.

7 176. By virtue of the said false record, statement, and other acts of concealment  
8 and improper avoidance, the United States incurred damages and therefore is entitled to multiple  
9 damages under the False Claims Act, plus a civil penalty for each violation of the Act.

10 **FIFTH CLAIM FOR RELIEF**

11 **False Claims Act: Relief From Retaliatory Actions Against Defendant TPMG**

12 **U.S.C. § 3730(h)**

13 177. Relator Victoria M. Hernandez repeats and re-alleges the allegations  
14 contained in Paragraphs 1 – 246 above as though they are fully set forth herein.

15 (a) 31 U.S.C. § 3730(h), Relief From Retaliatory Actions, provides:

16 (i) In general.— Any employee, contractor, or agent shall be entitled to  
17 all relief necessary to make that employee, contractor, or agent whole, if that employee,  
18 contractor, or agent is discharged, demoted, suspended, threatened, harassed, or in any other  
19 manner discriminated against in the terms and conditions of employment because of lawful  
20 acts done by the employee, contractor, or agent on behalf of the employee, contractor, or  
21 agent or associated others in furtherance of other efforts to stop 1 or more violations of this  
22 subchapter.

23 (ii) Relief.— Relief under paragraph (1) shall include reinstatement with  
24 the same seniority status that employee, contractor, or agent would have had but for the  
25 discrimination, 2 times the amount of back pay, interest on the back pay, and compensation  
26 for any special damages sustained as a result of the discrimination, including litigation costs  
27  
28

1 and reasonable attorneys' fees. An action under this subsection may be brought in the  
2 appropriate district court of the United States for the relief provided in this subsection.

3 178. Ms. Hernandez was employed by the Kaiser Defendants from June 1995  
4 through October 2015. From January 2000 forward, Ms. Hernandez's was employed in various  
5 coding leadership positions.

6 179. Ms. Hernandez received stellar employment reviews throughout her career  
7 with Kaiser until she was hired into Kaiser's TPMG organization. In her last year of Kaiser  
8 employment (October 2014 through October 2015), the only year that she worked at Kaiser's TPMG  
9 subsidiary, Ms. Hernandez was criticized for purported lack of communication and, at the same  
10 time, also reprimanded for communicating her concerns about TPMG's coding and auditing  
11 functions.

12 180. This review came after, and was the direct result of, Ms. Hernandez observing  
13 and reporting internally several of the coding errors and systemic fraud detailed herein committed  
14 at and by Kaiser and its affiliates, including TPMG.

15 181. The poor review was improper retribution for Ms. Hernandez's efforts to  
16 bring to the attention of leadership the deceptive and fraudulent practices within Kaiser. She was  
17 set up to be terminated for reporting what she observed even though she had been asked by TPMG  
18 leadership to stop looking for another job. Ms. Hernandez felt harassed, disrespected, and bullied.  
19 She was subjected to threats and intimidation by TPMG leadership.

20 182. In October 2015, in anticipation of being terminated, and due to Kaiser  
21 TPMG's intimidation and harassment, she resigned her position with Kaiser.

22 183. Ms. Hernandez engaged in protected activity by, among other things,  
23 reporting to multiple Kaiser supervisors her concerns that Kaiser was submitting illegal, unlawful  
24 and/or false claims to the Government in an effort to stop Kaiser from presenting or causing to be  
25 presented to the Government false or fraudulent claims for payment or approval, and from making,  
26 using or causing to be made or used, a false record or statement material to a false or fraudulent  
27 claim.

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1 184. Kaiser TPMG knew that Ms. Hernandez engaged in the above described  
2 protected activity.

3 185. Kaiser TPMG discharged, demoted, threatened, harassed, and otherwise  
4 discriminated against Ms. Hernandez as a result of her protected activities.

5 186. As a result of Kaiser's unlawful actions, Ms. Hernandez has suffered a loss of  
6 employment opportunities and earnings and a loss of future earnings and earning capacity, and Ms.  
7 Hernandez has suffered, and continues to suffer, non-monetary damages, including, but not limited  
8 to, emotional and physical distress, humiliation, embarrassment, loss of esteem, and loss of  
9 enjoyment of life.

10 **SIXTH CLAIM FOR RELIEF**

11 **Violation of Cal. Lab. Code § 1102.5, *et seq.* Against Defendant TPMG**

12 187. Relator Victoria M. Hernandez repeats and re-alleges the allegations  
13 contained in Paragraphs 1 – 256 above as though they are fully set forth herein.

14 188. In violation of Cal. Lab. Code § 1102.5, Defendant TPMG, by and through  
15 its principals, agents and employees, retaliated against Ms. Hernandez for having opposed, resisted,  
16 and complained of the acts alleged herein.

17 189. Defendant TPMG retaliated against Ms. Hernandez for opposing and refusing  
18 to participate in Defendant's violations of state and federal statutes and/or rules and regulations. In  
19 contesting Defendant's violations, Ms. Hernandez was engaged in protected activity. Under Cal.  
20 Lab. Code § 1102.5, Defendant TPMG is prohibited from retaliation against Ms. Hernandez for  
21 opposing any practices forbidden or made unlawful under Cal. Lab. Code § 1102.5.

22 190. In taking the actions alleged herein, Defendant TPMG acted with malice,  
23 fraud and oppression, and in reckless disregard of Ms. Hernandez's rights, entitling her to an award  
24 of punitive damages.

25 191. As a result of Defendant TPMG's unlawful actions, Ms. Hernandez has  
26 suffered a loss of employment opportunities and earnings and a loss of future earnings and earning  
27 capacity, and Ms. Hernandez has suffered, and continues to suffer, non-monetary damages,  
28

1 including, but not limited to, emotional and physical distress, humiliation, embarrassment, loss of  
2 esteem, and loss of enjoyment of life.

3 **SEVENTH CLAIM FOR RELIEF**

4 **Violation of Cal. Lab. Code § 98.6 Against Defendant TPMG**

5 192. Relator Victoria M. Hernandez repeats and re-alleges the allegations  
6 contained in Paragraphs 1 – 261 above as though they are fully set forth herein.

7 193. In violation of Cal. Lab. Code § 98.6, Defendant TPMG, by and through its  
8 principals, agents and employees, retaliated against Ms. Hernandez for having opposed, resisted,  
9 and complained of the acts alleged herein.

10 194. After Ms. Hernandez complained about and objected to Kaiser's practices  
11 detailed herein and in response to such complaints and objections, Defendant TPMG subjected her  
12 to ongoing retaliation, including but not limited to ostracism and the threat of termination.

13 195. In taking the actions alleged herein, Defendant TPMG acted with malice,  
14 fraud and oppression, and in reckless disregard of Ms. Hernandez's rights, entitling her to an award  
15 of punitive damages.

16 196. As a result of Defendant TPMG's unlawful actions, Ms. Hernandez has  
17 suffered a loss of employment opportunities and earnings and a loss of future earnings and earning  
18 capacity, and Ms. Hernandez has suffered, and continues to suffer, non-monetary damages,  
19 including, but not limited to, emotional and physical distress, humiliation, embarrassment, loss of  
20 esteem, and loss of enjoyment of life.

21 **EIGHTH CLAIM FOR RELIEF**

22 **Violation of Fair Labor Standards Act Against Defendant TPMG**

23 **29 U.S.C. § 215**

24 197. Relator Victoria M. Hernandez repeats and re-alleges the allegations  
25 contained in Paragraphs 1 – 266 above as though they are fully set forth herein.

26 198. In violation of the Fair Labor and Standards Act of 1939 ("FLSA"),  
27 Defendant TPMG, by and through its principals, agents and employees, retaliated against Ms.

1 Hernandez in constructively discharging her for having opposed, resisted, and complained of the  
2 acts alleged herein, including numerous violations of federal law and rules and regulations.

3 199. In making the above-described internal complaints, Ms. Hernandez was  
4 engaged in a protected activity under the FLSA. Defendant TPMG willfully continued to mask its  
5 violations after Ms. Hernandez apprised Defendant of the extent of Defendant's non-compliant  
6 practices. Ms. Hernandez subsequently suffered an adverse employment action when she was  
7 constructively discharged from her employment by Defendant in retaliation for making said  
8 complaints and refusing to accede to Defendant's masking of its unlawful practices.

9 200. In taking the actions alleged herein, Defendant TPMG acted with malice,  
10 fraud and oppression, and in reckless disregard of Ms. Hernandez's rights, entitling her to an award  
11 of punitive damages.

12 201. As a result of Defendant TPMG's unlawful actions, Ms. Hernandez has  
13 suffered a loss of employment opportunities and earnings and a loss of future earnings and earning  
14 capacity, and Ms. Hernandez has suffered, and continues to suffer, non-monetary damages,  
15 including, but not limited to, emotional and physical distress, humiliation, embarrassment, loss of  
16 esteem, and loss of enjoyment of life.

17 **PRAYER**

18 **WHEREFORE**, *qui tam* plaintiffs Gloryanne Bryant and Victoria M. Hernandez  
19 pray for judgment against Defendants as follows:

20 On Claims I, II, III, and IV (False Claims Act), against all Defendants jointly and  
21 severally:

- 22 • for the amount of the United States' damages, trebled as required by law, together with the  
23 maximum civil penalties allowed by law, costs, post-judgment interest, and such other and  
24 further relief as the Court may deem appropriate;
- 25 • for Relators to be awarded the maximum amount allowed pursuant to 31 U.S.C. § 3730(d)  
26 of the Federal False Claims Act;
- 27 • for Relators to be awarded all costs of this action, including attorneys' fees and expenses;

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- 1       • and for the United States and Relators to receive all such other relief as the Court deems just  
2       and proper.

3               Further, on Claims V, VI, VII, and VIII, Plaintiff-Relator Ms. Hernandez, on her own  
4 behalf, demands that judgment be entered in her favor and against Defendant The Permanente  
5 Medical Group, Inc. granting the following relief:

- 6       • An award of back pay with prejudgment interest;
- 7       • An award of front pay in lieu of reinstatement;
- 8       • An award of general damages to compensate Ms. Hernandez for the mental and  
9       emotional distress caused by Defendant TPMG's misconduct;
- 10       • An award of punitive damages to deter and punish Defendant TPMG;
- 11       • An award of double, treble, exemplary, and/or punitive damages pursuant to 31  
12       U.S.C. § 3730(h)(2), the California Labor Code, and the FLSA;
- 13       • An award of attorneys' fees and costs pursuant to 31 U.S.C. § 3730(h)(2), the  
14       California Labor Code, and the FLSA; and
- 15       • An award of such other and further relief as this Court deems just and proper.

16                               **DEMAND FOR JURY TRIAL**

17               Relators hereby demand a trial by jury as to all issues.

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1 Dated: November 15, 2021

2 Respectfully submitted,

3 GLORYANNE BRYANT and  
4 VICTORIA M. HERNANDEZ

5 By  /s/ Roger A. Lewis

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18 *Counsel for Plaintiffs-Relators*

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# **EXHIBIT 1**

 **Incidental finding on radiology reports for outpatient encounter**

ICD-9-CM Coding Clinic, Third Quarter 2010 Pages: 8-9 Effective with discharges: October 1, 2010


**Question:**

We are requesting guidance on coding **incidental** findings found on radiology reports during outpatient encounters. For example, a patient is seen in the emergency department (ED) for chest pain and a computed tomography (CT) of the chest and abdomen are performed. The CT of the abdomen was performed to rule out any type of gastritis associated chest pain. The impression on the CT is normal except for "single renal cyst." The cyst is not documented anywhere else on the ED record, nor does it appear to be related to the reason why the CT was initially performed.

Are we correct in interpreting existing guidelines and previous *Coding Clinic* advice that findings from x-rays performed on patients in the ED should not be coded except to gain greater specificity for an already diagnosed condition? Do you agree that it is the responsibility of the ED physician to document the relevance and pertinence of each diagnosis in his/her final impression? To us, this is different than the guidelines we follow for coding outpatient diagnostic tests when the patient presents to the ancillary department specifically for a particular test and interpretation. There is no other physician involved to 'coordinate' the care, treatment, and diagnosis of the patient like there is when the patient presents to the ED and gets these tests performed.

**Answer:**

It is inappropriate to report an **incidental finding** found on a radiology report when the **finding** is unrelated to the sign, symptom, or condition that necessitated the performance of the test for a patient being seen in the emergency department (ED). The ED physician would need to clarify that the **finding** was clinically significant and related to the visit in order for it to be coded.

 **Outpatient chest x-ray (radiology) coding**

ICD-10-CM/PCS Coding Clinic, First Quarter ICD-10 2017 Page: 7 Effective with discharges: March 13, 2017

[Related Information](#)

**Question:**

The physician refers a patient for chest x-ray to outpatient radiology with a diagnosis of weakness and chronic myelogenous leukemia (CML). The radiology report demonstrated no acute disease and moderate hiatal hernia. For reporting purposes, which codes are appropriate for the facility to assign?

**Answer:**

The facility should assign code R53.1, Weakness, and code C92.10, Chronic myeloid leukemia, BCR/ ABL-positive, not having achieved remission, for this encounter. It is not appropriate to report code K44.9, Diaphragmatic hernia without obstruction or gangrene, for the hiatal hernia, because it is an **incidental finding**.

# **EXHIBIT 2**



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**Date:** March 1, 2012

**To:** NCAL HIM Directors, HIM Coding Staff

**Cc:** Regional Coding Review Managers  
Gloryanne Bryant, NCAL Managing Director HIM  
Dawna Toews, NCAL Regional Assoc. Director of Hospital Coding  
Dexter D'Costa, NCAL Regional Director of CDI  
Helena Rush, NCAL Regional Manager of CDI QA

**From:** Nancy J Andersen, Regional Director of Hospital Coding

**Subject:** Coding Aortic Atherosclerosis

One of the roles of Regional HIM is to assist with providing coding guidance to questions that occur repeatedly. Some concern has been raised to us by HIM coding staff regarding the coding of "aortic atherosclerosis" as a secondary diagnosis. This memo has been developed to provide guidance to the HIM coding staff in the correct assignment of aortic atherosclerosis as a secondary diagnosis.

**Overview:**

There have been recent discussions among HIM and CDI staff regarding the appropriate capture of aortic atherosclerosis as a secondary diagnosis. Input was sought from Janet D. Franklin of Kaiser's National Compliance Office (NCO). Based on a discussion held with NCO, Regional HIM and CDI QA leadership, the following criteria is to be used when determining whether or not to assign aortic atherosclerosis as a secondary diagnosis.

The determination as to whether or not aortic atherosclerosis (AA) documented on radiology reports should be considered an incidental finding is dependent upon the following:

- Was the purpose of the diagnostic radiology exam **specifically** to look for or diagnose AA? If the physician does not indicate the significance and/or relevance of the aortic atherosclerosis to the admission or encounter, it is considered an incidental finding and should not be coded. This is in keeping with AHA *Coding Clinic* advice which states incidental findings in a radiology report are not to be coded when they are unrelated to the sign, symptom, or condition that necessitated the performance of the test.

- If the AA is an incidental finding on the radiology report because the study was not performed specifically to look for AA, review the documentation to determine if any of the following is present:
  - a. Treatment directed towards the AA such as medication prescribed?
  - b. Required follow up documented by the physician?
  - d. Other indication that the AA was evaluated by the physician beyond stating "the patient has AA"?

If none of the above conditions are met, the AA is considered an incidental finding and the physician should **not** be queried about it **nor should it be coded**. It is the responsibility of the physician to document the relevance and pertinence of each diagnosis in his/her documentation.

**References:**

AHA *Coding Clinic*, Third Quarter 2010, pages 8-9:

"It is inappropriate to report an incidental finding found on a radiology report when the finding is unrelated to the sign, symptom, or condition that necessitated the performance of the test for a patient being seen in the emergency department (ED). The ED physician would need to clarify that the finding was clinically significant and related to the visit in order for it to be coded."

AHA *Coding Clinic*, Second Quarter 1990, pages 15 – 16:

*Abnormal findings (laboratory, X-ray, pathologic, and other diagnostic results) are not coded and reported unless the physician indicates their clinical significance. If the findings are outside the normal range and the physician has ordered other tests to evaluate the condition or prescribed treatment, it is appropriate to ask the physician whether the diagnosis should be added.*

The coder should not arbitrarily add an additional diagnosis ....on the basis of an abnormal laboratory finding alone. To make a diagnosis on the basis of a single lab value or abnormal diagnostic finding is risky and carries the possibility of error. Is this from Coding Clinic or guidelines?

**Action Required:** Immediate distribution to all HIM coders and CDI QA staff

If you have any questions please contact me directly via email at: [nancy.j.andersen@kp.org](mailto:nancy.j.andersen@kp.org) or via phone at 510 625-5674. Thank you.

# **EXHIBIT 3**



**Aortic Atherosclerosis - Confidential**

**Gloryanne H Bryant** to: Janet D Franklin

Cc: Nancy J Andersen, Dawna M Toews

Default custom expiration date: 03/02/2015

03/09/2012 02:38 PM

Janet, I'm not sure I should even email you about this.....So now another question about this issue of Aortic Atherosclerosis.....hearing from Dr Bliss this afternoon ... he just told us that "aortic atherosclerosis" is always significant and a risk factor so thus they will teach the MDs to document that so it will be coded.

So the clinical documentation improvement (CDI) program will query for significance if it's not there.

Of course AA it's an HCC too.

I'm a little troubled by this approach and I believe Nancy is also.

Maybe we should ask Dr Bliss about the clinical studies that indicate ANY degree of aortic atherosclerosis puts the patient at risk?

Gloryanne Bryant, RHIA, CCS, CCDS

Certified ICD-10-CM/PCS Trainer

Regional Managing Director HIM

NCAL Revenue Cycle

Kaiser Foundation Health Plan Inc & Hospitals

1800 Harrison St. 24th Floor, Oakland, CA 94612

510 625-3980 (tel)

510 625-5701 (fax)

Admin Asst: Shirley Palmer #510 625 4945

email: [Gloryanne.h.bryant@kp.org](mailto:Gloryanne.h.bryant@kp.org)

Please visit the NCAL HIM resources, tools and information online at our wiki:

<http://wiki.kp.org/wiki/x/fYDGBQ>

BRING SAFETY TO WORK: Know the Basics; Look for Causes; Let Someone Know; Work Safely; and Ask For Help

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# **EXHIBIT 4**



Re: Fw: phi -- addending aortic atherosclerosis   
Gloryanne H Bryant to: Anne V Cadwell, Rebecca J Robinson  
Cc: David Bliss, David L Nyburg, Diane Ott, Karen Graham, Sylvia  
Delacadena, Victoria M Hernandez

12/03/2012 03:36 PM

Default custom expiration date: 03/02/2015

Hi there, yes we can discuss this specific documentation and coding situation. Rebecca can you set up a mtg to discuss this. I believe this week is packed, so maybe early next week would work.

Gloryanne Bryant, RHIA, CCS, CDIP, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
Regional Managing Director HIM  
NCAL Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1800 Harrison St. 24th Floor, Oakland, CA 94612  
510 625-3980 (tel)  
510 625-5701 (fax)

email: Gloryanne.h.bryant@kp.org

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Anne V Cadwell

Hi Gloryanne and Victoria It seems that we conti...

12/03/2012 11:45:50 AM

From: Anne V Cadwell/CA/KAIPERM  
To: Gloryanne H Bryant/CA/KAIPERM, Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Cc: Sylvia Delacadena/CA/KAIPERM@Kaiperm, David Bliss/CA/KAIPERM@KAIPERM, Karen  
Graham/CA/KAIPERM@Kaiperm, David L Nyburg/CA/KAIPERM@KAIPERM, Diane  
Ott/PO/KAIPERM@Kaiperm  
Date: 12/03/2012 11:45 AM  
Subject: Fw: phi -- addending aortic atherosclerosis

Hi Gloryanne and Victoria

It seems that we continue to have communication issues at the local HIM level re Aortic Atherosclerosis. Do you think we could set up a call with all the local HIMS directors to discuss this? We are asking our physicians to do addendums to clarify any documentation. We do not want to wait until next year - as the HIMs person is suggestion below. We do want not want to perform retrospective reviews - we have worked very hard to get current on everything we do. We need to get everyone on the same page that AA is not an incidental finding from a clinical perspective. Can we set up a call this week?

I am arranging a call with the ED physician at GSAA - no need for you to call them.

Thanks - We really need to be aligned on this. If you have a better approach - let us know.

Anne V. Cadwell  
Managing Director  
The Permanente Medical Group  
1950 Franklin St., 16th floor  
Oakland, CA 94612  
Office: 510-987-2774  
Fax: 510-873-5244  
Cell: 510-735-7561

Executive Assistant: Celina.M.Hodges 510-987-2771

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From: Sylvia Delacadena/CA/KAIPERM  
To: Anne V Cadwell/CA/KAIPERM@KAIPERM  
Date: 12/03/2012 11:30 AM  
Subject: Fw: phi -- addending aortic atherosclerosis

---

Here you go.....

Please advise.

Sylvia Delacadena |Manager, TPMG Business Services /Controller's Office |Office: 510.675.5544,  
Tie Line: 8.434.5544|Mobile: 510.427.3274

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From: Kamar F Braish/CA/KAIPERM  
To: Christopher A Wan/CA/KAIPERM@Kaiperm  
Cc: Sylvia Delacadena/CA/KAIPERM@Kaiperm, Jonathan Hall/CA/KAIPERM@KAIPERM, Ashley N Case/CA/KAIPERM@KAIPERM, Pam Grewal/CA/KAIPERM@Kaiperm, Phil Wald/CA/KAIPERM@KAIPERM, Lucy A Martinez, Scott Tafuri/CA/KAIPERM@KAIPERM, Merritt Quisumbing-Anderson/CA/KAIPERM@KAIPERM, Charles Thevnin/CA/KAIPERM  
Date: 12/03/2012 09:14 AM  
Subject: Re: phi -- addending aortic atherosclerosis

---

Hi Dr. Wan:

I agree with you so I checked with region and they confirmed that under Medicare Advantage reporting guidelines we can report HCC dx up for a year later, since MA works on a calendar year and not individual encounters, so that is allowed and that is why we can perform retrospective HCC capture. Moving forward this has to stop since we are sending bills and doing an HCC capture for Medicare so the government will be looking and comparing our data. This work should be guided by the TPMG CMS Auditors lead by Pam.

Sylvia: all additions have to be compliant and the below is not acceptable to Coding compliance. Please work with Pam before requesting physicians to add diagnosis.

I had Victoria regional coding review manager take a look at this case below and here is what she found:

After reviewing the record, no I would NOT code the 440.0 Aortic Atherosclerosis since it does not meet UHDDS definition of "other diagnosis." It appears to be an incidental finding from the radiology report and AA was not mentioned, treated or followed-up anywhere else throughout the record. In addition, the radiology report was not ordered specifically to look for AA. This would be in line with our instructions from the regional guidance memo on when to code Aortic Atherosclerosis. I'm attaching our guidance memo from March 2012 just for reference. Thanks, Kamar and let me know if I can help with anything else. Thanks.

[attachment "Coding+Guidance+Memo+-+Aortic+Atherosclerosis3.2012.pdf" deleted by Gloryanne H Bryant/CA/KAIPERM]

**VICTORIA M. HERNANDEZ, RHIT, CCS, CRCR, AHIMA-Approved ICD-10-CM/PCS Trainer**

*Kamar F. Braish, B.S., RHIT*  
**HIM DIRECTOR**  
Greater Southern Alameda Service Area  
27400 Hesperian Blvd. Hayward, CA 94545  
Phone: 510-784-4242 Cell: 510-460-0852  
Fax: 510-784-6219  
Email: [Kamar.F.Braish@kp.org](mailto:Kamar.F.Braish@kp.org)

**Staff Assistant: Desrinique Jordan**  
Phone: 510-784-4384  
Tie-line: 8-430  
Fax: 510-784-4884  
Email: [Desrinique.L.Jordan@kp.org](mailto:Desrinique.L.Jordan@kp.org)



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Christopher A Wan Kamar, I think we could use some guidance and...

12/01/2012 08:29:20 AM

# **EXHIBIT 5**

Date: Wednesday, December 12, 2012  
Time: 3:00 pm, Pacific Standard Time (San Francisco, GMT-08:00)  
Meeting Number: 570 398 298  
Meeting Password: Addending101

-----  
To start or join the online meeting  
-----

Go to  
<https://kponline.webex.com/kponline/j.php?ED=217792652&UID=494591302&PW=NMGY5NGViN2I0&R T=MIM0>

-----  
Audio conference information  
-----

To receive a call back, provide your phone number when you join the meeting, or call the number below and enter the access code.

Call-in toll-free number (US/Canada): 1-877-668-4490

Call-in toll number (US/Canada): 1-408-792-6300

Global call-in numbers:

<https://kponline.webex.com/kponline/globalcallin.php?serviceType=MC&ED=217792652&tollFree=1>

Toll-free dialing restrictions: [http://www.webex.com/pdf/tollfree\\_restrictions.pdf](http://www.webex.com/pdf/tollfree_restrictions.pdf)

Access code:570 398 298

-----  
For assistance  
-----

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2. On the left navigation bar, click "Support".

To add this meeting to your calendar program (for example Microsoft Outlook), click this link:

<https://kponline.webex.com/kponline/j.php?ED=217792652&UID=494591302&ICS=MS&LD=1&RD=2&ST=1&SHA2=tvhLf7pG0bcADfA6DZd0zxs6A6pmjnO2yjbyrz11kL4=>

To check whether you have the appropriate players installed for UCF (Universal Communications Format) rich media files, go to <https://kponline.webex.com/kponline/systemdiagnosis.php>.

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CCM: +14087926300x570398298#

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Anne V Cadwell Hi Glorianne and Victoria It seems that... 12/03/2012 11:45:50 AM

From: Anne V Cadwell/CA/KAIPERM  
To: Glorianne H Bryant/CA/KAIPERM, Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Cc: Sylvia Delacadena/CA/KAIPERM@Kaiperm, David Bliss/CA/KAIPERM@KAIPERM, Karen Graham/CA/KAIPERM@Kaiperm, David L Nyburg/CA/KAIPERM@KAIPERM, Diane Ott/PO/KAIPERM@Kaiperm

VH00035

REL0000052

Date: 12/03/2012 11:45 AM  
Subject: Fw: phi -- addending aortic atherosclerosis

---

Hi Gloryanne and Victoria

It seems that we continue to have communication issues at the local HIM level re Aortic Atherosclerosis. Do you think we could set up a call with all the local HIMS directors to discuss this? We are asking our physicians to do addendums to clarify any documentation. We do not want to wait until next year - as the HIMS person is suggestion below. We do want not want to perform retrospective reviews - we have worked very hard to get current on everything we do. We need to get everyone on the same page that AA is not an incidental finding from a clinical perspective. Can we set up a call this week?

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Thanks - We really need to be aligned on this. If you have a better approach - let us know.

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Subject: Fw: phi -- addending aortic atherosclerosis

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Here you go.....

Please advise.

Sylvia Delacadena |Manager, TPMG Business Services /Controller's Office |Office:  
510.675.5544, Tie Line: 8.434.5544|Mobile: 510.427.3274

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[attachment "Coding+Guidance+Memo+-+Aortic+Atherosclerosis3.2012.pdf" deleted by Gloryanne H Bryant/CA/KAIPERM]

**VICTORIA M. HERNANDEZ, RHIT, CCS, CRCR, AHIMA-Approved ICD-10-CM/PCS Trainer**

*Kamar F. Braish, B.S., RHIT*  
**HIM DIRECTOR**  
**Greater Southern Alameda Service Area**  
27400 Hesperian Blvd. Hayward, CA 94545  
Phone: 510-784-4242 Cell: 510-460-0852  
Fax: 510-784-6219  
Email: [Kamar.F.Braish@kp.org](mailto:Kamar.F.Braish@kp.org)

**Staff Assistant: Desrinique Jordan**  
Phone: 510-784-4384  
Tie-line: 8-430  
Fax: 510-784-4884  
Email: [Desrinique.L.Jordan@kp.org](mailto:Desrinique.L.Jordan@kp.org)



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Christopher A Wan    Kamar, I think we could use some gui...    12/01/2012 08:29:20 AM

From: Christopher A Wan/CA/KAIPERM  
To: Kamar F Braish/CA/KAIPERM@KAIPERM  
Date: 12/01/2012 08:29 AM  
Subject: phi -- addending aortic atherosclerosis

---

Kamar,

I think we could use some guidance and perhaps some clarity on these requests coming from coding -- do you know who could help us understand better?

In this case -- I'm being asked to add in a diagnosis on an ED chart from 3/2012 (about 8 months ago) for a diagnosis that we don't really make in the ER -- and one that doesn't even officially get read by the radiologist until after the patient has left.

What I'm looking for is some reassurance that this in no way would be considered fraud or inappropriate -- because of the length of time the information is entered, and simply also that it's not a diagnosis that we make in the ER, and the official readings that come from radiology won't come back for 1 or 2 days -- so the finding really has no impact on our ER care.

If I can get reassurance, I'm more than happy to enter the information -- but because of the concerns -- I'm sure I share this with many ER physicians.

If Joint Commission or Medicare came in to audit the cases and they saw this -- would they have any concerns or issues?

Hyperspace - FRE-ED\*\* >HOSPITAL - Production - HCNCPRODEBM PRODEBM

ED Manager | Track Board | In Basket | ED Chart | Chart | Pt Lists | Tel Enc | Ancil Ord Enc

**In Basket**

New Msg | Sec Pt Msg | Refresh | Edit Pools | Settings | Search | Attach | Out | Properties | Reply

- Pt: OnlineMsg
- Pt: Call Back
- Pt: Tel/Online Encounter
- Pt: Reminder
- Staff Message**
- Results (181)**
- Result Notes
- Chart: CC'd Charts (1)
- Chart: Open Visits (3)
- Chart: My Incomplete Notes
- Cosign - Clinic Orders (1)
- InPt/ED Follow Up
- My Incomplete Charts (62)**
- Remote In Basket Preview
- Letters-Unsent (1)
- My Incomplete Charts

**Staff Message** 0 unread, 2 total

QuickActions | Done | Review | Online Eng | Sec Pt Msg | Tel Call | Letter

Status	Msg Date	Msg Time
Read	11/07/2012	7:40 AM
Read	11/29/2012	4:44 PM

QuickActions: Manage QuickActions

REDACTED

REDACTED

**kp.org Status**  
Inactive

**Message**  
Hi Dr. Wan,  
On REDACTED you saw this patient in the ED. At that time you ordered an x-ray. Accordi  
Aortic Atherosclerosis - see image from this date. Please create an addenda and add  
Thank you!

**Patient Information**  
Age: REDACTED Sex: female DOB: REDACTED  
REDACTED

Telephone Information:

Just want to get your affirmation that this process is appropriate.

Chris

# **EXHIBIT 6**

**Gloryanne Bryant** <gloryanneb@sbcglobal.net>

To

victoriamhernandez@yahoo.com

Apr 21 at 2:09 PM

TPMG

[gloryanneb@sbcglobal.net](mailto:gloryanneb@sbcglobal.net)

--- On Wed, 12/5/12, <[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)> wrote:

> From: <[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)>

> Subject: Fw: PLEASE APPROVE\_NEW SMARTPHRASE FOR AORTIC ATHEROSCLEROSIS

> To: [gloryanneb@sbcglobal.net](mailto:gloryanneb@sbcglobal.net)

> Date: Wednesday, December 5, 2012, 12:05 PM

>

>

> Rebecca J Lange

>

> -----

> Original Message -----

>

> From: Rebecca J Lange

>

> Sent: 12/05/2012 10:36 AM

> PST

>

> To: Gloryanne Bryant; Roderick Madamba; Victoria Hernandez

>

> Cc: HIM Directors NCAL-KPNC

>

> Subject: Fw: PLEASE APPROVE\_NEW

> SMARTPHRASE FOR AORTIC ATHEROSCLEROSIS

>

> Good morning,

>

>

>

>

> Is this a local, facility decision whether to approve and use "SMARTPHRASES"

> ? Will everyone implement this

> "Aortic Atherosclerosis" phrase ?

>

>>

> Thank you,

>

> Rebecca Lange, RHIA, CRCR, Director

>

>

VH00042

REL0000058

>  
> Health Information Management and Operator Services  
> Kaiser Foundation Hospital San Francisco  
> 2425 Geary Blvd, M110  
> San Francisco, CA 94115  
> Office: (415) 833-3823 Cell: (415) 243-6962  
> Tie Line: 8-493-3823 Fax: (415) 833-3821  
> Pager: (415) 201-3757  
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>  
>  
>  
> -----  
> Forwarded by Rebecca J Lange/CA/KAIPERM on 12/05/2012 10:30  
> AM -----  
>  
>  
>  
> From: Joel Cho/CA/KAIPERM  
>  
> To: Rebecca J Lange/CA/KAIPERM  
>  
> Date: 12/04/2012 10:13 PM  
>  
> Subject: FW: PLEASE APPROVE\_NEW SMARTPHRASE FOR  
> AORTIC ATHEROSCLEROSIS  
>  
>  
>  
>  
> Rebecca,  
  
> Please see below. What do you think?  
>  
  
> Joel  
  
> Sent with Good (www.good.com)  
  
> ----- Forwarded by

> Joel Cho/CA/KAIPERM on 12/04/2012 10:12:58  
> PM-----  
> ----- Original Message -----  
>  
>  
>  
> From : Erica E Eastham/CA/KAIPERM  
>  
> To : EIO Field Trainers-KPPO, EIO DQ Auditors-KPNC, CMS  
> Proj Mgrs List-KPNC, Doc Code Phys Leads-KPNC  
>  
> Cc : EIO Mgt Team-KPNC-OAK  
>  
> Sent on : 12/04 10:01:39 PM PST  
>  
> Subject : PLEASE APPROVE\_NEW SMARTPHRASE FOR AORTIC  
> ATHEROSCLEROSIS  
>  
>  
>  
> Audience: EIO Field Trainers-KPPO, EIO DQ  
> Auditors-KPNC, CMS Proj Mgrs List-KPNC, Doc Code Phys  
> Leads-KPNC,  
>  
> Communication: Update on SmartPhrase  
> addition  
>  
> Effective: 12/3/12  
>  
>  
>  
> Hello,  
>  
> I have great news!  
> The SmartPhrase that was originally shared as a  
> 'best practice' from the NVA is now available in the  
> regional library of SmartPhrases for NCAL, making it  
> accessible to all NCAL clinicians. Below are the  
> details of the addition, the updated addenda job aid and a  
> few screenshots to illustrate use and the wording.  
>  
>  
>  
> Please contact me if you have any questions.  
>  
>  
>

- > (See attached file: Addenda Job Aid v5.doc)
- >
- > SmartPhrase Name: .AORTICATHEROSCLEROSIS
- >
- >> SmartPhrase Wording:
- >
- >
- > Aortic Atherosclerosis noted on review of the radiology exam associated with chart
- > review and this visit. Will follow longitudinally as an independent risk factor for CVD and CVA, with management per
- > standard risk factor controls over time by PCP or appropriate specialist
- >
- > Thanks,
- >
- > Erica
- >
- >
- > Erica E. Eastham, CCS-P
- > AHIMA Approved ICD-10-CM/PCS Trainer
- > Director, Documentation Quality Training
- > The Permanente Medical Group, Inc.
- > Encounter Information Operations
- > 1950 Franklin St. Oakland, CA. 94612
- > Desk line @ 1950 Franklin (510) 987-2419, tie 8-427
- > Desk line @ 2829 Watt Ave (916) 979-3570
- > Cell (510) 414-4774
- > Assistant: Sharonda R Morris (510) 987-4452
- >
- >
- >
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- > Thank you.
- >
- >
- >
- >

# **EXHIBIT 7**



**Re: Fw: Followup on Aortic Atherosclerosis - coding guidance nat'l**

Gloryanne H Bryant to: Janet D Franklin

01/11/2013 02:52 PM

Cc: Nancy J Andersen, Victoria M Hernandez, Carolyn J Mar

Default custom expiration date: 03/02/2015

We've already addressed this internally in the region and had TPMG work with us on understanding the clinical significance of this condition.

TPMG takes the position that once AA is present it never goes away and is then a life long risk factor. In addition, the condition will continue to evolve without medical treatment or intervention, which could include, stop smoking, diet, eat healthy, decrease cholesterol, exercise, take aspirin, take prescribed meds ie statins, Thus the treatment could be any of these.

We looked at this criteria and definition and AA does meet these.

- Is always present, even though it may have been stabilized; (cannot be resolved, eradicated, or removed) AND
- By its very nature (because of its impact on the patient), requires that it be considered by the physician in evaluating the patient's chief complaint; AND
- The condition affects a major body system (and typically, more than one major body system)

We (NCAL) do believe that AA meets the criteria to be reportable and does impact care and decision making.

To go further with this discussion I believe needs individual with greater clinical knowledge like physicians and would invite TPMG ie Dr David Bliss) to discuss this further.

Gloryanne Bryant, RHIA, CCS, CDIP, CCDS  
 AHIMA Approved ICD-10-CM/PCS Trainer  
 Regional Managing Director HIM  
 NCAL Revenue Cycle  
 Kaiser Foundation Health Plan Inc & Hospitals  
 1800 Harrison St. 24th Floor, Oakland, CA 94612  
 510 625-3980 (tel)  
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email: [Gloryanne.h.bryant@kp.org](mailto:Gloryanne.h.bryant@kp.org)

Please visit the NCAL HIM resources, tools and information online at our wiki:

<http://wiki.kp.org/wiki/x/FYDGBQ>

**BRING SAFETY TO WORK: Know the Basics; Look for Causes; Let Someone Know; Work Safely; and Ask For Help**

**Excellence in Health Information Management Documentation, Data and Operations**

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Janet D Franklin

Hi Nancy, Per our phone conversation today, I a...

01/11/2013 02:34:49 PM

From: Janet D Franklin/PO/KAIPERM  
 To: Nancy J Andersen/CA/KAIPERM@KAIPERM  
 Cc: Gloryanne H Bryant/CA/KAIPERM@KAIPERM, Victoria M Hernandez/CA/KAIPERM@KAIPERM, Carolyn J Mar/PO/KAIPERM@KAIPERM  
 Date: 01/11/2013 02:34 PM  
 Subject: Re: Fw: Followup on Aortic Atherosclerosis - coding guidance nat'l

Hi Nancy,

Per our phone conversation today, I am responding to your e-mail below and adding additional comments related to the copy/paste function for radiology reports, Coding Clinic regarding incidental findings and dot phrases.

### 1. Systemic condition

I would find it had to qualify aortic atherosclerosis as meeting the definition of a systemic condition, particularly the requirement that by its very nature, it requires the provider to consider it regardless of the reason for the encounter.

#### Definition

- Is always present, even though it may have been stabilized; (cannot be resolved, eradicated, or removed) AND
- By its very nature (because of its impact on the patient), requires that it be considered by the physician in evaluating the patient's chief complaint; AND
- The condition affects a major body system (and typically, more than one major body system)

### 2. Always Code List

It would be inappropriate to add this condition to the Always Code List. That list is to be referenced only after the following two questions has been answered by the coder, 1) Is it a systemic condition? If yes, the condition should be coded. If no then 2) Does the documentation support that the condition impacted the encounter? If yes, the condition should be coded. Only if the answer is no to both questions, would the coder reference the always code list. The always code list contains those conditions that KP feels should always be coded even when they do not impact the encounter. As such, the only diagnoses allowed to be on this list are those that have no financial impact. Otherwise, we would have a written document instructing coders to add codes that impact reimbursement for conditions that did not impact the encounter resulting in reimbursement to which KP is not entitled.

The last time I reviewed this list, we carefully checked to make sure that there were no conditions listed on the Always Code List where the codes would result in increased reimbursement, either from a DRG perspective or from an HCC perspective. Aortic atherosclerosis maps to both a CMS-HCC and an RxHCC resulting in additional reimbursement and cannot be added to this list.

### 3. Copy/paste

If the provider copy/pastes a radiology report into their note, the fact that the radiology report mentions a finding of aortic atherosclerosis is, on its own, insufficient to code the condition for a couple of reasons

- Physicians will tell us that they copy/paste a note into a record because they agree with the findings. They also tell us that they copy/paste the report into their note to have it front of them as a reference, but the copy/paste activity does not imply their agreement with the diagnosis and because of that, they should not be required to assign a visit diagnosis (with resulting code) for the condition nor should they be dinged on an audit because their visit diagnosis did not accurately reflect the documentation in the copy/pasted note. Basically, we have a function where, without additional documentation, we cannot determine the intent/purpose of the use.
- If the finding of aortic atherosclerosis was incidental to the reason for the test (e.g. chest x-ray for pneumonia), then based on Coding Clinic guidelines, it cannot be coded unless the provider indicates the significance of the finding.

Thanks,

Janet (don't forget the) D Franklin

Janet D Franklin, RHIT, CCS, CCS-P, CHC  
AHIMA Approved ICD-10-CM/PCS Trainer  
Compliance Manager, Government Audit and Reimbursement  
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Admin Assistant: Elizabeth Styles-Bartlett  
8-423-6831, 510-271-6831

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Nancy J Andersen    Hi Janet, I know we discussed this request previ...    12/19/2012 10:06:56 AM

From: Nancy J Andersen/CA/KAIPERM  
To: Janet D Franklin/PO/KAIPERM@KAIPERM  
Cc: Gloryanne H Bryant/CA/KAIPERM  
Date: 12/19/2012 10:06 AM  
Subject: Fw: Followup on Aortic Atherosclerosis - coding guidance nat'l

---

Hi Janet,

I know we discussed this request previously, however in researching atherosclerosis I am finding it described as a "systemic disease" and I'm wondering if aortic atherosclerosis should therefore also be considered a systemic disease. I also believe that atherosclerosis is considered a chronic condition; once a patient has it it doesn't go away (such as CAD).

Per AHA Coding Clinic:

"Chronic conditions such as, but not limited to, hypertension, Parkinson's disease, COPD, and diabetes mellitus are chronic systemic diseases that ordinarily should be coded even in the absence of documented intervention or further evaluation. Some chronic conditions affect the patient for the rest of his or her life and almost always require some form of continuous clinical evaluation or monitoring during hospitalization, and therefore should be coded. This advice applies to inpatient coding."

I am unclear whether aortic atherosclerosis is in the same category those mentioned in Coding Clinic in terms of the affect this condition has on the patient for the rest of their life. Should we look for input from a physician champion such as Internal Medicine and/or Vascular Surgeon? I'd really like to put this question to bed once and for all.

VH00049

REL0000064

Thanks,

Nancy J. Andersen, MS, RHIA, CCS, CRCR, AHIMA-Approved ICD-10-CM/PCS Trainer  
Senior Compliance Manager, Care Delivery and Health Information Management  
National Compliance, Ethics and Integrity Office  
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*Embed a culture of compliance across the care delivery enterprise that inspires the highest level of ethics and integrity*

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— Forwarded by Nancy J Andersen/CA/KAIPERM on 12/18/2012 03:51 PM —

From: Gloryanne H Bryant/CA/KAIPERM  
To: Nancy J Andersen/CA/KAIPERM@KAIPERM  
Cc: Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Date: 12/14/2012 05:30 AM  
Subject: Followup on Aortic Atherosclerosis - coding guidance nat'l

---

Nancy in followup on the NCAL call relating to the documentation and capture of Dx Aortic Atherosclerosis, we'd like to bring this issue to the coding governance and consideration of inclusion in the "always" code list. We do understand that AA may not be systemic but still would like some guidance. thank you.

Gloryanne Bryant, RHIA, CCS, CDIP, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
Regional Managing Director HIM  
NCAL Revenue Cycle  
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email: Gloryanne.h.bryant@kp.org  
Please visit the NCAL HIM resources, tools and information online at our wiki:  
<http://wiki.kp.org/wiki/x/fYDGBQ>  
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# **EXHIBIT 8**



**AA presentation**

**Sherry A Davis** to: Gloryanne H Bryant, Victoria M Hernandez

01/10/2013 12:44 PM

Default custom expiration date: 03/02/2015

History: This message has been replied to.

Here's my copy of the presentation with my notes. Also, I tried to capture all the questions and answers on the last page.



Documentation & Coding Aortic Atheroscl 1.2013 final.pdf

**Sherry A. Davis, RHIA**

Interim Regional Director of Hospital Coding

1800 Harrison St. 24th Fl, Oakland, CA 94612

[E-mail Sherry A. Davis](#)

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# Documentation and Coding Aortic Atherosclerosis Clarification

Conference Call

January 2013  
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VH00053

REL000067

## Background

**TPMG has been working on identifying (diagnosing) Aortic Atherosclerosis as part of early detection and quality of care.**

**Failure to capture and document chronic conditions will adversely affect our ability to care for our members.**

**Diagnosing “Aortic Atherosclerosis” is good patient care.**

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VH00054

REL000068

## **Physician Training: Diagnosis specificity- Aortic Atherosclerosis**

*Area of significant missed opportunity*


**Be sure to add the Aortic Atherosclerosis diagnosis to an encounter when reviewing imaging. Due to the high incident of missed opportunity, the below process has been implemented.**

**Review and Capture Process Radiologist documents calcification in Aorta in Impression**

**Treating or Ordering Physician Captures Diagnosis**

- Reviews Radiology Impression Note
- Adds an ED visit and adds Aortic Atherosclerosis diagnosis

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VH00055

REL000069

## New Approved Dot Phrase to Help

### Aortic Atherosclerosis

Aortic Atherosclerosis noted on review of the radiologist exam associated with chart reviewed this visit. Will follow longitudinally as an independent risk factor for CVD and CVA, with management per standard risk factor controls over time by PCP or appropriate specialist.

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VH00056

REL000070

PRE-PROCEDURE ASSESSMENT

Unspecified Hemorrhage of GI Tract

Lxxxx M Bxxxx is a xx YO male

The past and present medical history of this patient were reviewed on 9/9/2099, including past relevant consultation notes. Results of relevant diagnostic tests were examined. The patient's past anesthesia experience was reviewed.... Medications being taken currently as well as medication allergies were also reviewed.

Last Oral Intake: 6 pm

Physical Exam:

A physical exam was performed on 1/3/2012. Vital signs were reviewed, and pertinent exam findings are as follows.....

Procedural Sedation Plan: IV versed and fentanyl

Intended Level of Sedation: II (Moderate/Conscious Sedation)

Informed consent regarding .....

Additional / Pertinent Clinical or Lab Data: No significant findings ....

ASA Rating: 2

Will proceed as planned.

**Current Medical History:**

**DM2 w Diabetic CKD3**

**Hyperlipidemia**

**Hyperthyroidism**

**Hypertension**

**GERD**

**Migrane**

**Aortic Atherosclerosis**

**I have confirmed with the patient and/or the medical record the presence of the above diagnoses, and the diagnoses are followed by his or her FCP or appropriate specialist.**

PAUL T KEFALIDES MD

For outpatient procedures (GI/PMR), are there specific documentation guidelines to provide the MD's as a way to capture conditions that can be coded by HIMS per coding guidelines?

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VH00057

REL000071

## Clinical Aspects: Arteriosclerosis/Atherosclerosis

### Clinical Definition:

**Arteriosclerosis is a general term for several disorders that cause thickening and loss of elasticity in the arterial wall.**

- Atherosclerosis, is the most common form of this disorder and is the most serious because it causes coronary artery disease (CAD) and cerebrovascular disease.
- Sometimes referred to as: “Hardening of the arteries”

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## Clinical Aspects: Etiology of Atherosclerosis

- Atherosclerotic plaque- a collection of lipids, cholesterol, inflammatory cells, smooth muscle cells, connective tissue, thrombi, and **Calcium deposits**.
  - Stable plaque grow slowly or remain static until they may cause stenosis or occlusion
  - Unstable plaque cause thrombosis, occlusion, and infarction
- All stages of atherosclerosis are considered an inflammatory response to injury particularly the endothelial.
- Specific areas of the arterial tree are affected more than others due to turbulent blood flow.
- Atherosclerosis is a **chronic disease**
- Note: Atherosclerosis is one of the major causes of abdominal aortic aneurysm.

## Clinical Aspects: Risk Factors for Atherosclerosis

- Dyslipidemia (high LDL, low HDL): high cholesterol
- Diabetes
- Smoking
- Obesity
- Metabolic Syndrome (abdominal obesity, along with at least 2 of the following: dyslipidemia, hypertension, insulin resistance)
- Hyperinsulinemia
- Prothrombotic states
- Hypertension
- Renal insufficiency
- Systemic infections
- Age
- Family history
- Sedentary lifestyle

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# Clinical Aspects: Atherosclerosis Signs & Symptoms (Dr. Bliss)

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VH00061

# Coding and Reporting

(Gloryanne)

## CODING OF SECONDARY CONDITIONS

### General Information

The guidelines for the coding of secondary diagnoses have been clarified in order to ensure consistency in accurately assigning appropriate secondary diagnosis codes.

Per CODING CLINIC, the definition for "other diagnoses" includes additional conditions that affect patient care in terms of requiring:

- clinical evaluation; or
- therapeutic treatment; or
- diagnostic procedures; or
- extended length of hospital stay; or
- increased nursing care and/or monitoring

Systemic diseases (e.g., diabetes mellitus, hypertension, Parkinson's disease – see List A) are always coded, even in the absence of documented active intervention since these types of conditions meet one or more of the elements of the definition given above. (Coding Clinic, Second Quarter, 1990, page 14.)

**Note: you only need one of the criteria for "other diagnosis" reporting.**

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REL000076

# Coding and Reporting


## AHA Coding Clinic

**Systemic diseases** (e.g., diabetes mellitus, hypertension, Parkinson's disease) are always coded, even in the absence of documented active intervention since these types of conditions meet one or more of the elements of the definition given above. (Coding Clinic, Second Quarter, 1990, page 14.)

Note: e.g. means example, thus is list is only an example of systemic diseases

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REL000077

# Coding and Reporting

## AHA Coding Clinic 3<sup>rd</sup> Qtr- 2007

Chronic conditions such as, **but not limited to**, hypertension, Parkinson's disease, COPD, and diabetes mellitus **are chronic systemic diseases that ordinarily should be coded even in the absence of documented intervention or further evaluation.** Some chronic conditions affect the patient for the rest of his or her life and almost always require some form of continuous clinical evaluation or monitoring during hospitalization, and therefore should be coded. This advice applies to inpatient coding.

For **outpatient encounters/visits**, chronic conditions that require or affect patient care treatment or management should be coded.

The Official Guidelines for Coding and Reporting for Outpatient Services, state, "Chronic diseases treated on an ongoing basis may be coded and reported as many times as the patient receives treatment and care for the conditions(s).

**"Code all documented conditions that coexist at the time of the encounter/visit and require or affect patient care treatment or management.** Do not code conditions that were previously treated and no longer exist." This information was previously published in Coding Clinic, Fourth Quarter 2006, pages 236-240.

Conversely, conditions that do not require or affect patient care, treatment or management are not reported

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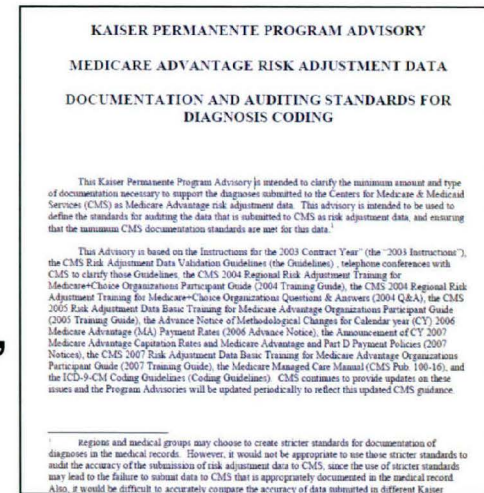
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REL000078

# Kaiser Permanente MA Documentation and Coding Guidance

- According to the Coding Guidelines, certain diagnoses such as hypertension, Parkinson’s disease, and diabetes mellitus are example of systemic diseases that should be coded, even in the absence of documented active interventions. [Coding Clinic, Second Quarter, 1990, p.14].
- Based on these Coding Guidelines, Kaiser has developed the following Coding and Documentation Guideline for coding of such systemic diseases for Kaiser Foundation Hospitals, referred to as the **“Always Code”** Guideline.



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# KP MA: Documentation and Coding Reportable Systemic Conditions (con't)

**Systemic diseases . . . are always coded, even in the absence of documented active intervention**

**Systemic conditions always to be coded include, but are not limited to, the following:**

**AIDS**

**Lupus**

**Atherosclerosis**

**Multiple sclerosis**

**Collagen vascular disease**

**Parkinson's Disease**

**Diabetes mellitus**

**Renal Failure, Chronic**

**Hypertension**

**Rheumatoid Arthritis**

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REL000080

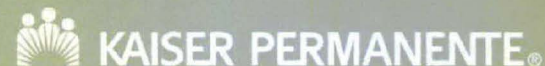
## Kaiser Permanente MA: Documentation and Coding (con't)

The following statements further define the acceptability of the submission of “systemic conditions.”

A diagnosis will always be coded and is acceptable for submission to CMS as risk adjustment data, even in the absence of expressly documented active treatment, evaluation, or intervention by the physician, **if the condition meets all four of the following criteria:**

- 1) The condition is always present, even though it may have been stabilized; AND
- 2) By its very nature (because of its impact on the patient), the condition must be considered by the physician in evaluating the patient's chief complaint; AND
- 3) The condition affects a major body system (and, typically, more than one major body system), which include the following:
  - (A) Cardiovascular; AND/OR
  - (B) Respiratory: AND/OR
  - (C) Gastrointestinal; AND/OR
  - (D) Renal; AND/OR
  - (E) Hematologic/Lymphatic/Immunologic; AND/OR
  - (F) Neurologic; AND/OR
  - (G) Psychiatric; AND
- 4) The physician indicates that he/she considered the diagnosis by documenting the diagnosis in the medical record for the encounter.

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REL000081

# Kaiser Permanente “Always Code List”

**Systemic Conditions - List A Examples of systemic conditions always to be coded include, but are not limited to, the following:**

AIDS

Asthma, chronic obstructive

Atherosclerosis, generalized

Bronchitis, chronic obstructive

Collagen vascular disease

COPD

Diabetes mellitus

Emphysema

Hypertension

Systemic lupus erythematosus

Multiple sclerosis

Parkinson’s disease


Peripheral vascular disease

Chronic kidney disease

Rheumatoid arthritis

**\*Note: Attending physician confirmation of clinical significance of all radiology findings is required for inpatients per Coding Clinic.**

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VH00068

REL000082

## Summary

- **Physician focus on diagnosing and documenting “Aortic Atherosclerosis”**
- **Secondary Diagnosis reporting criteria**
  - Only need one of the criteria to report dx
- **Coding Guidelines regarding Chronic Systemic Conditions**
- **KP MA Guidelines on Chronic Systemic Conditions & reporting criteria**
- **KP Always Code List**
- **Documenting and Coding “Aortic Atherosclerosis” is good patient care**

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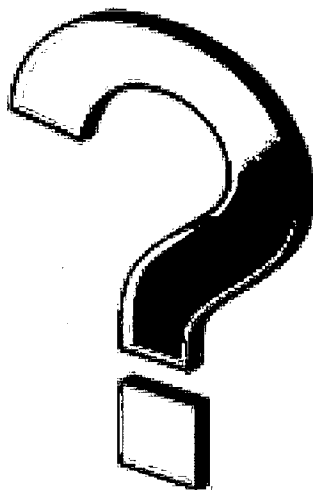
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REL000083

# Questions



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# Thank you

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REL000085

# **EXHIBIT 9**

# Documentation and Coding Leads Meeting

September 13, 2011



1950 Franklin St., 2<sup>nd</sup> floor, Conference Dining Room

REL000086

# Agenda

- Welcome & Introductions
- Seeing Patients, Maintaining Diagnoses, Data Mining & NLP
- HCCs Increased Capture
  - Diabetes Specificity
  - CKD
  - Vascular Disease: Aortic Atherosclerosis
  - Protein Calorie Malnutrition
  - Other Dx Capture Issues: Vertebral Fracture; Dementia
- Demo Medicare Advantage eCode tool
- E/M: Level of Service Coding Completion (hard stop)
  - Scope, Training & Reports
- Celebration

## 2011 GOALS

- ✓ **Refresh 99% Diagnoses**
- ✓ **Address 99% 2010 Data Mining & NLP Conditions**

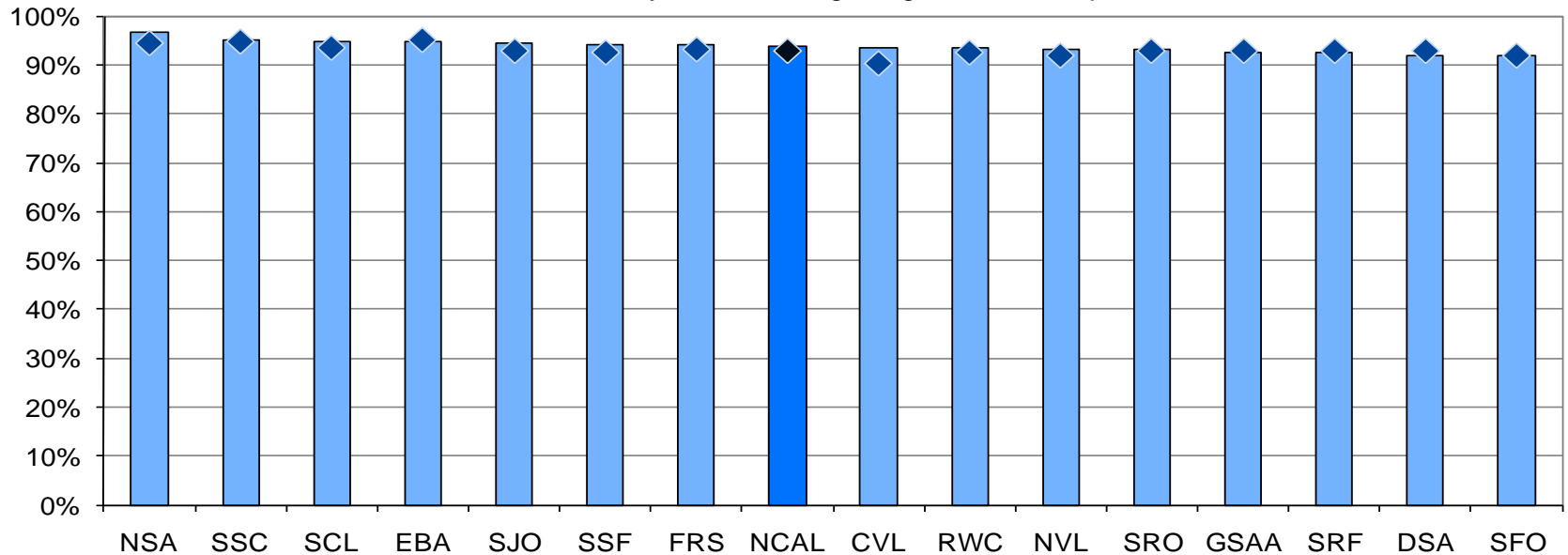
Includes all inpatient, outpatient and claims-based face-to-face encounters with a qualified CMS provider

# Seeing Patients

SEEING PATIENTS WITH A CHRONIC CONDITION OR DATA MINING PROMPT  
YTD 2011 / 2010 COMPARISON

Pre Period: January 1, 2008 through December 31, 2010

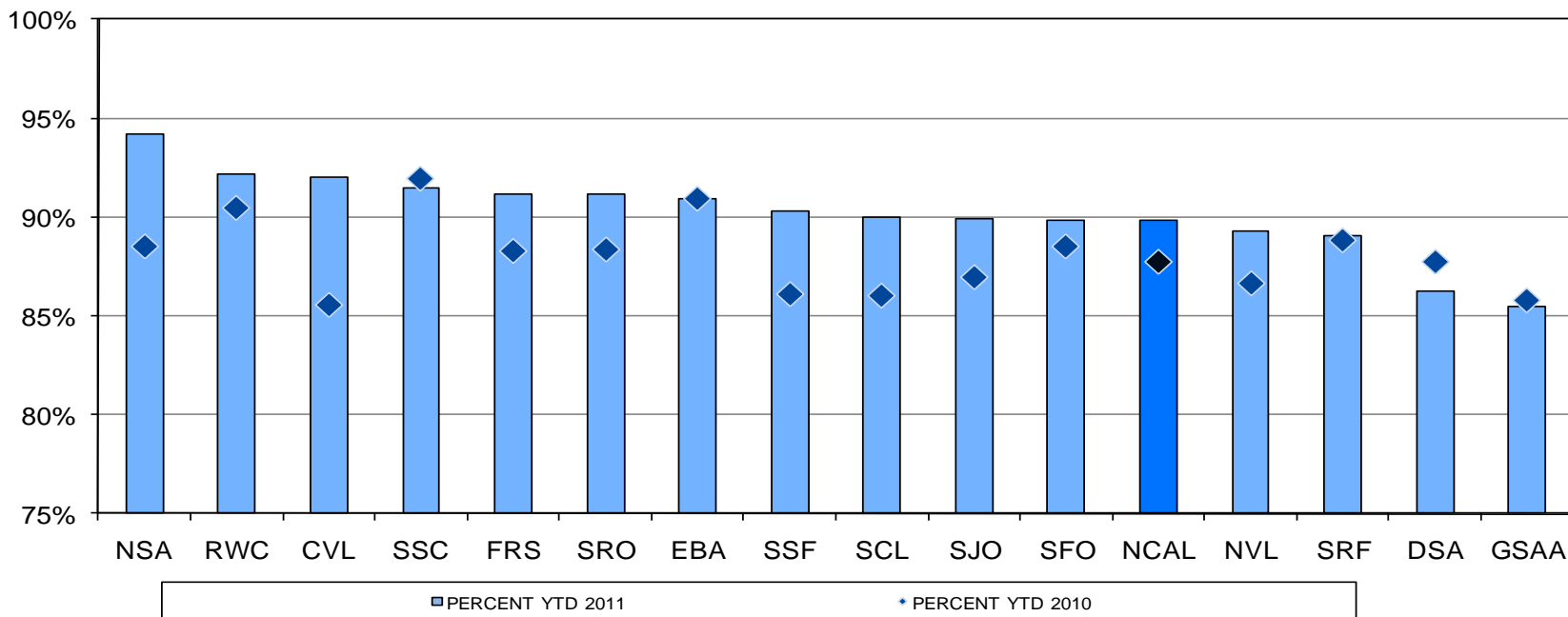
Post Period: January 1, 2011 through August 31, 2011 Update



	NSA	SSC	SCL	EBA	SJO	SSF	FRS	NCAL	CVL	RWC	NVL	SRO	GSAA	SRF	DSA	SFO
<b>MA Members With a Chronic Dx in Pre-Period OR Data Mining Prompt</b>	21,548	16,188	29,420	25,501	17,701	14,358	16,189	334,546	18,389	11,259	52,940	16,441	21,974	16,306	40,360	15,972
<b>MA Members With a Chronic Dx in Pre-Period OR Data Mining Prompt NOT SEEN YTD</b>	677	776	1,503	1,331	948	815	962	20,976	1,171	741	3,603	1,121	1,593	1,200	3,225	1,310
<b>Total % Seen YTD 2011</b>	96.9%	95.2%	94.9%	94.8%	94.6%	94.3%	94.1%	93.7%	93.6%	93.4%	93.2%	93.2%	92.8%	92.6%	92.0%	91.8%
<b>Total % Seen YTD 2010</b>	94.6%	94.8%	93.5%	95.3%	92.9%	92.5%	93.2%	93.0%	90.5%	92.6%	91.8%	92.9%	93.1%	92.8%	92.8%	92.1%

# Maintaining Diagnoses

MAINTAINING ACCURATE & UP-TO-DATE DIAGNOSES  
 REFRESHED CHRONIC DIAGNOSES - YTD 2010 / 2011 COMPARISON  
 Pre Period: January 1, 2008 through December 31, 2010  
 Post Period: January 1, 2011 through August 31, 2011



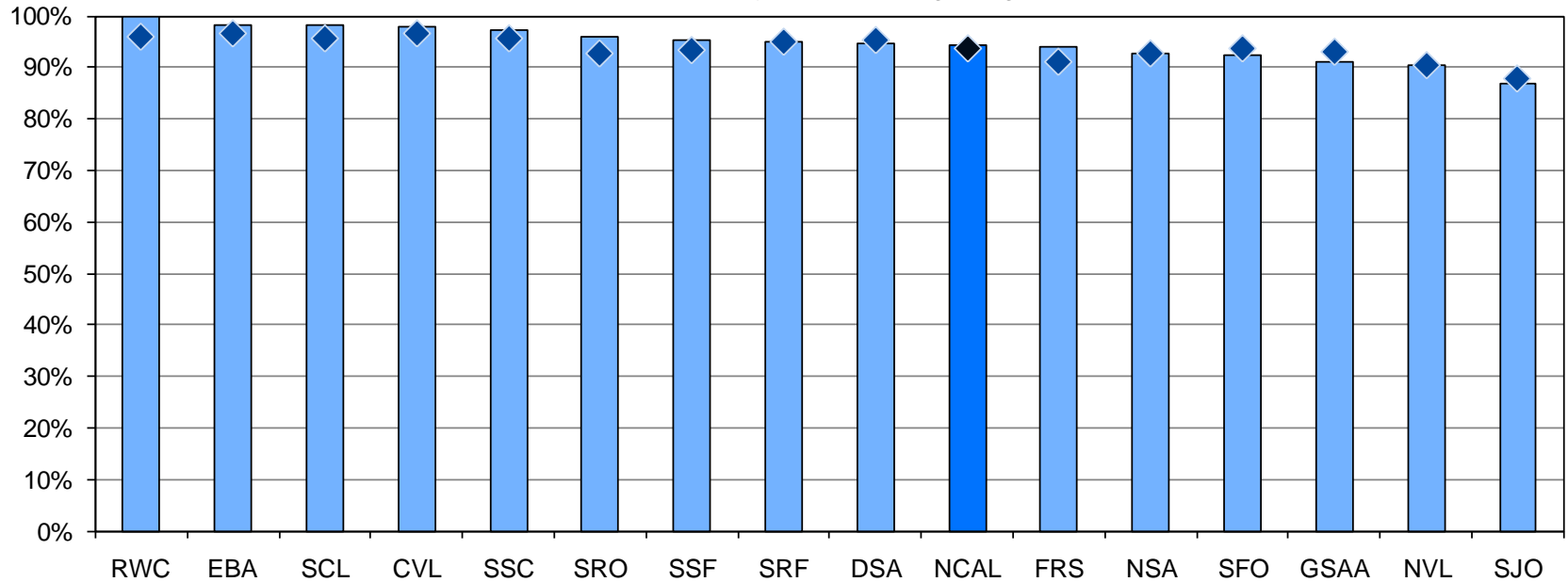
	NSA	RWC	CVL	SSC	FRS	SRO	EBA	SSF	SCL	SJO	SFO	NCAL	NVL	SRF	DSA	GSAA
TOTAL CHRONIC CMS HCC PRE PERIOD	65,986	30,371	56,536	48,992	48,384	44,886	70,923	42,172	82,657	50,769	43,840	952,413	149,406	42,563	109,324	65,604
TOTAL CHRONIC CMS HCC POST PERIOD	62,150	27,996	52,020	44,825	44,111	40,916	64,486	38,089	74,367	45,636	39,395	855,739	133,460	37,913	94,315	56,060
PERCENT YTD 2011	94.2%	92.2%	92.0%	91.5%	91.2%	91.2%	90.9%	90.3%	90.0%	89.9%	89.9%	89.8%	89.3%	89.1%	86.3%	85.5%
PERCENT YTD 2010	88.5%	90.5%	85.6%	91.9%	88.3%	88.3%	91.0%	86.1%	86.0%	87.0%	88.5%	87.8%	86.6%	88.8%	87.8%	85.8%

# Maintaining Diagnoses - ESRD

## ESRD MEMBERS - MAINTAINING ACCURATE & UP-TO-DATE DIAGNOSES REFRESHED CHRONIC DIAGNOSES - YTD 2010 / 2011 COMPARISON

Pre Period: January 1, 2008 through December 31, 2010

Post Period: January 1, 2011 through August 31, 2011



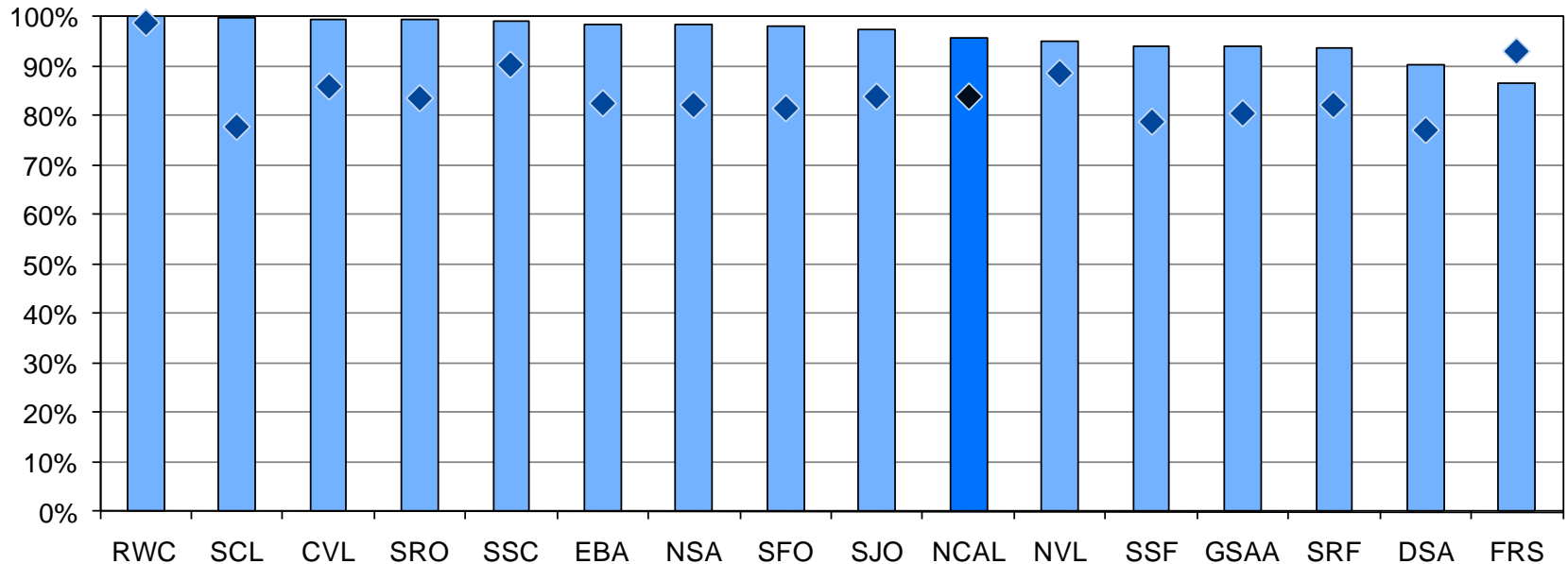
	RWC	EBA	SCL	CVL	SSC	SRO	SSF	SRF	DSA	NCAL	FRS	NSA	SFO	GSAA	NVL	SJO
TOTAL CHRONIC CMS HCC PRE PERIOD	298	1,830	1,414	1,047	1,333	469	794	300	1,820	17,103	575	1,332	1,097	1,510	2,127	1,157
TOTAL CHRONIC CMS HCC POST PERIOD	298	1,798	1,388	1,026	1,296	450	757	285	1,722	16,116	541	1,236	1,013	1,376	1,924	1,006
PERCENT YTD 2011	100.0%	98.3%	98.2%	98.0%	97.2%	95.9%	95.3%	95.0%	94.6%	94.2%	94.1%	92.8%	92.3%	91.1%	90.5%	86.9%
PERCENT YTD 2010	96.1%	96.7%	95.6%	96.5%	95.7%	92.7%	93.2%	94.9%	95.2%	93.6%	91.0%	92.8%	93.7%	93.0%	90.4%	88.0%

# Maintaining Diagnoses - SNF

SNF MEMBERS - MAINTAINING ACCURATE & UP-TO-DATE DIAGNOSES  
REFRESHED CHRONIC DIAGNOSES - YTD 2010 / 2011 COMPARISON

Pre Period: January 1, 2008 through December 31, 2010

Post Period: January 1, 2011 through August 31, 2011



■ PERCENT YTD 2011      ◆ PERCENT YTD 2010

	RWC	SCL	CVL	SRO	SSC	EBA	NSA	SFO	SJO	NCAL	NVL	SSF	GSA	SRF	DSA	FRS
TOTAL CHRONIC CMS HCC PRE PERIOD	143	1,088	546	342	514	1,086	493	251	423	9,896	1,928	291	744	599	803	645
TOTAL CHRONIC CMS HCC POST PERIOD	143	1,087	544	340	509	1,071	485	246	412	9,488	1,831	274	700	562	726	558
PERCENT YTD 2011	100.0%	99.9%	99.6%	99.4%	99.0%	98.6%	98.4%	98.0%	97.4%	95.9%	95.0%	94.2%	94.1%	93.8%	90.4%	86.5%
PERCENT YTD 2010	98.9%	77.8%	85.8%	83.7%	90.3%	82.5%	82.0%	81.4%	84.0%	83.9%	88.8%	78.9%	80.6%	82.3%	77.1%	93.1%

# Data Mining by Medical Center

Data Mining Facility Report - By Medical Center - Data Extracted 9/4/2011									
DM Condition: (ALL) <input type="button" value="v"/>									
Data Mining Condition:		(Multiple Items)							
MEDICAL CENTER	DATA MINING DIAGNOSES RELEASED	DATA MINING Dx ASSIGNED	DATA MINING Dx STOP PROMPT	TOTAL ADDRESSED	% ASSIGNED	% STOP PROMPT	% ADDRESSED	REMAINING DATA MINING DIAGNOSES	% OF REMAINING DATA MINING DIAGNOSES
(CVL) Central Valley	519	366	40	406	90.1%	9.9%	78.2%	113	21.8%
(DSA) Diablo Service Area	961	543	141	684	79.4%	20.6%	71.2%	277	28.8%
(EBA) East Bay Area	683	386	146	532	72.6%	27.4%	77.9%	151	22.1%
(FRS) Fresno	463	247	93	340	72.6%	27.4%	73.4%	123	26.6%
(GSAA) Greater Southern Alameda Area	581	267	201	468	57.1%	42.9%	80.6%	113	19.4%
(NSA) Napa Solano Area	750	425	112	537	79.1%	20.9%	71.6%	213	28.4%
(NVL) North Valley	1,572	908	95	1,003	90.5%	9.5%	63.8%	569	36.2%
(RWC) Redwood City	218	122	31	153	79.7%	20.3%	70.2%	65	29.8%
(SCL) Santa Clara	231	160	25	185	86.5%	13.5%	80.1%	46	19.9%
(SFO) San Francisco	281	151	70	221	68.3%	31.7%	78.6%	60	21.4%
(SJO) San Jose	116	88	3	91	96.7%	3.3%	78.4%	25	21.6%
(SRF) San Rafael	314	148	55	203	72.9%	27.1%	64.6%	111	35.4%
(SRO) Santa Rosa	321	164	75	239	68.6%	31.4%	74.5%	82	25.5%
(SSC) South Sacramento	441	285	91	376	75.8%	24.2%	85.3%	65	14.7%
(SSF) South San Francisco	204	140	21	161	87.0%	13.0%	78.9%	43	21.1%
<b>NCAL Region</b>	<b>7,655</b>	<b>4,400</b>	<b>1,199</b>	<b>5,599</b>	<b>78.6%</b>	<b>21.4%</b>	<b>73.1%</b>	<b>2,056</b>	<b>26.9%</b>
COLUMN		COLUMN HEADING DESCRIPTION							
Released Data Mining Diagnoses	Released for facilities to work on.								
Total Addressed	Sum of members assigned and members with Stop Prompt (by Providers).								
% Assigned	Number of members assigned divided by Total Addressed.								
% Stop Prompt	Number of members with Stop Prompt (by Providers) divided by Total Addressed.								
% Addressed	Total Addressed divided by Released members with data mining condition.								
Remaining Data Mining Diagnoses	Released members with Data Mining condition minus the number addressed year to date.								
% Remaining Data Mining Diagnoses	Number of remaining members divided by total number of Released members with data mining condition.								
<b>Notes:</b>									
YTD % OF DATA-MINING'S POSSIBLE CHRONIC CMS HCC ADDRESSED BY FACILITY									
FOR ALL M+C MEMBERS (LESS ESRD & HOSPICE). DM DX MAY BE ADDRESSED IN ALL DEPTS.									
DM DX RELEASED IN PERIOD = 1/1/2011 TO 09/04/2011									
DM DX STOP-PROMPT PERIOD = 1/1/2011 TO 09/04/2011									

# Data Mining by Condition

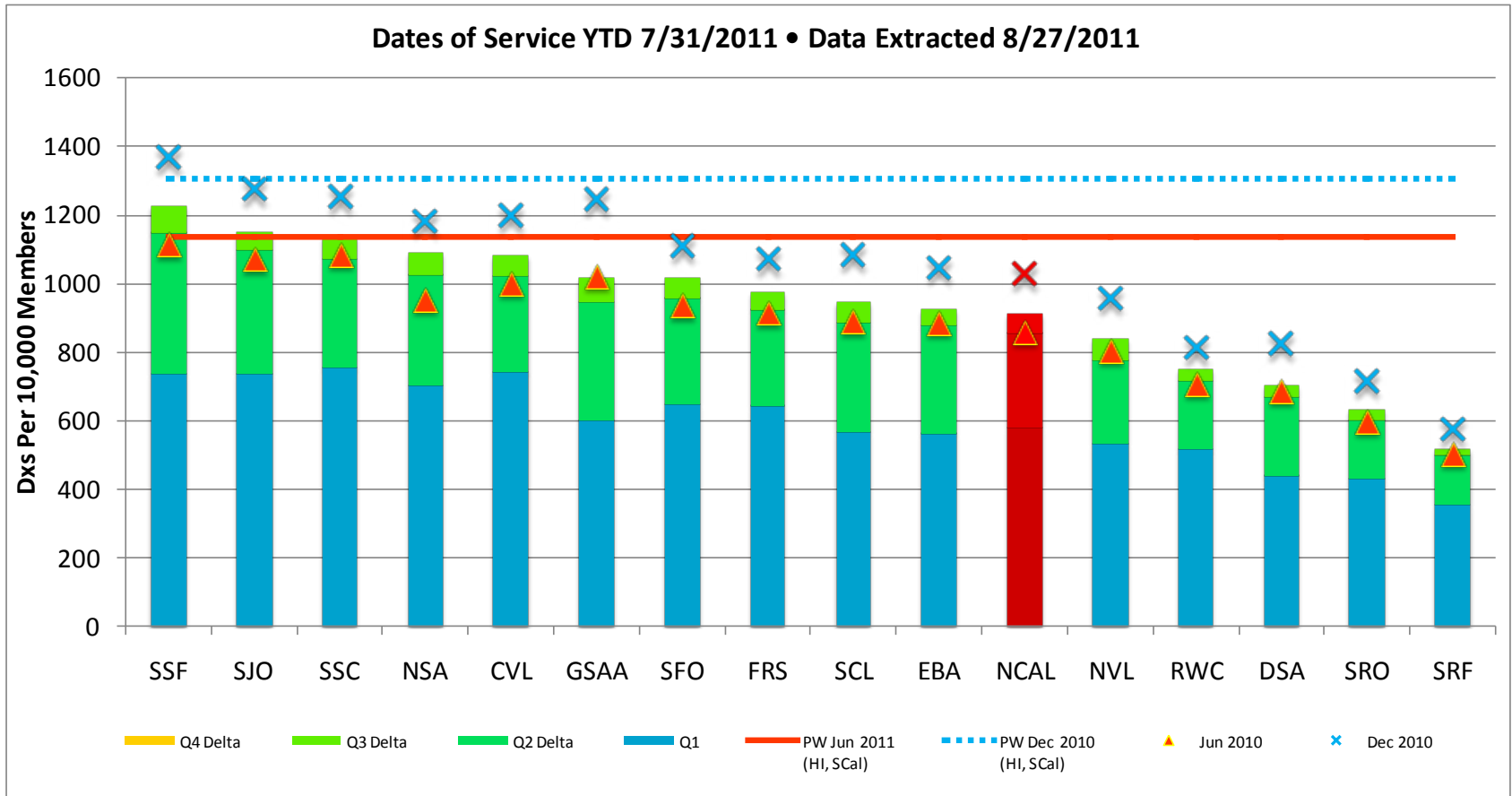
Data Mining Facility Report - By Condition - Data Extracted 9/4/2011									
LMC Id: (ALL) <input type="text"/>					Facility Id: (ALL) <input type="text"/>				
License Medical Center:			NCAL Region		Facility Name:		All Facilities		
DATA MINING CONDITION	DATA MINING DIAGNOSES RELEASED	DATA MINING Dx ASSIGNED	DATA MINING Dx STOP PROMPT	TOTAL ADDRESSED	% ASSIGNED	% STOP PROMPT	% ADDRESSED	REMAINING DATA MINING DIAGNOSES	% OF REMAINING DATA MINING DIAGNOSES
AMPUTATIONS	8	4	-	4	100.0%	0.0%	50.0%	4	50.0%
CACHEXIA (ROUND 2)	413	161	97	258	62.4%	37.6%	62.5%	155	37.5%
CHRONIC KIDNEY DISEASE	1,074	722	87	809	89.2%	10.8%	75.3%	265	24.7%
CHRONIC RESPIRATORY FAILURE	864	472	192	664	71.1%	28.9%	76.9%	200	23.1%
CONSIDER MAJOR DEPRESSION	689	256	171	427	60.0%	40.0%	62.0%	262	38.0%
DM W/ DIABETIC ERECTILE DYSFUNCTION	351	230	34	264	87.1%	12.9%	75.2%	87	24.8%
DM W/ DIABETIC PERIPHERAL NEUROPATHY	378	150	140	290	51.7%	48.3%	76.7%	88	23.3%
DM W/ DIABETIC PVD	107	46	26	72	63.9%	36.1%	67.3%	35	32.7%
DM2 W/ LO HDL & HI TRIGLYCERIDES D/T DM DIABETIC DYSLIPIDEMIA	596	420	32	452	92.9%	7.1%	75.8%	144	24.2%
DM W/ DIABETIC CKD	1,212	690	166	856	80.6%	19.4%	70.6%	356	29.4%
DM2 W/ DIABETIC NEPHROPATHY, MICROALBUNURIA	1,234	820	127	947	86.6%	13.4%	76.7%	287	23.3%
HEART FAILURE	23	15	7	22	68.2%	31.8%	95.7%	1	4.3%
HX OF MI/STABLE ANGINA	400	238	55	293	81.2%	18.8%	73.3%	107	26.8%
OSTOMY	31	27	-	27	100.0%	0.0%	87.1%	4	12.9%
PANCREATITIS	16	5	6	11	45.5%	54.5%	68.8%	5	31.3%
PERIPHERAL VASCULAR DISEASE	206	109	49	158	69.0%	31.0%	76.7%	48	23.3%
SEIZURE	49	32	9	41	78.0%	22.0%	83.7%	8	16.3%
TRACHEOSTOMY	4	3	1	4	75.0%	25.0%	100.0%	-	0.0%
<b>TOTAL ALL COND</b>	<b>7,655</b>	<b>4,400</b>	<b>1,199</b>	<b>5,599</b>	<b>78.6%</b>	<b>21.4%</b>	<b>73.1%</b>	<b>2,056</b>	<b>26.9%</b>
CACHEXIA (ROUND 1)	3,008	1,430	1,578	3,008	47.5%	52.5%	100.0%	-	0.0%
CONSIDER AORTIC ATHEROSCLEROSIS	4,413	165	12	177	93.2%	6.8%	4.0%	4,236	96.0%
COLUMN	COLUMN HEADING DESCRIPTION								
Released Data Mining Diagnoses	Released for facilities to work on.								
Total Addressed	Sum of members assigned and members with Stop Prompt (by Providers).								
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## Natural Language Process Findings

- All NCal clinic NLP findings being reviewed by TPMG physicians (2010 dates of service)
  
- Potential Diagnoses, once verified by physician reviewer, will be
  - 1) added to Data Mining (as was 2009 dates of service)
  - 2) submitted to CMS for 2011 revenue year
  
- Total Volume clinically reviewed (2010 dos) - 1,822
  - Potential positive findings approximately 70% to date
  
- Last year (2009 dos) Total Volume clinically reviewed – 2,198
  - 70% recommended for Dx Capture

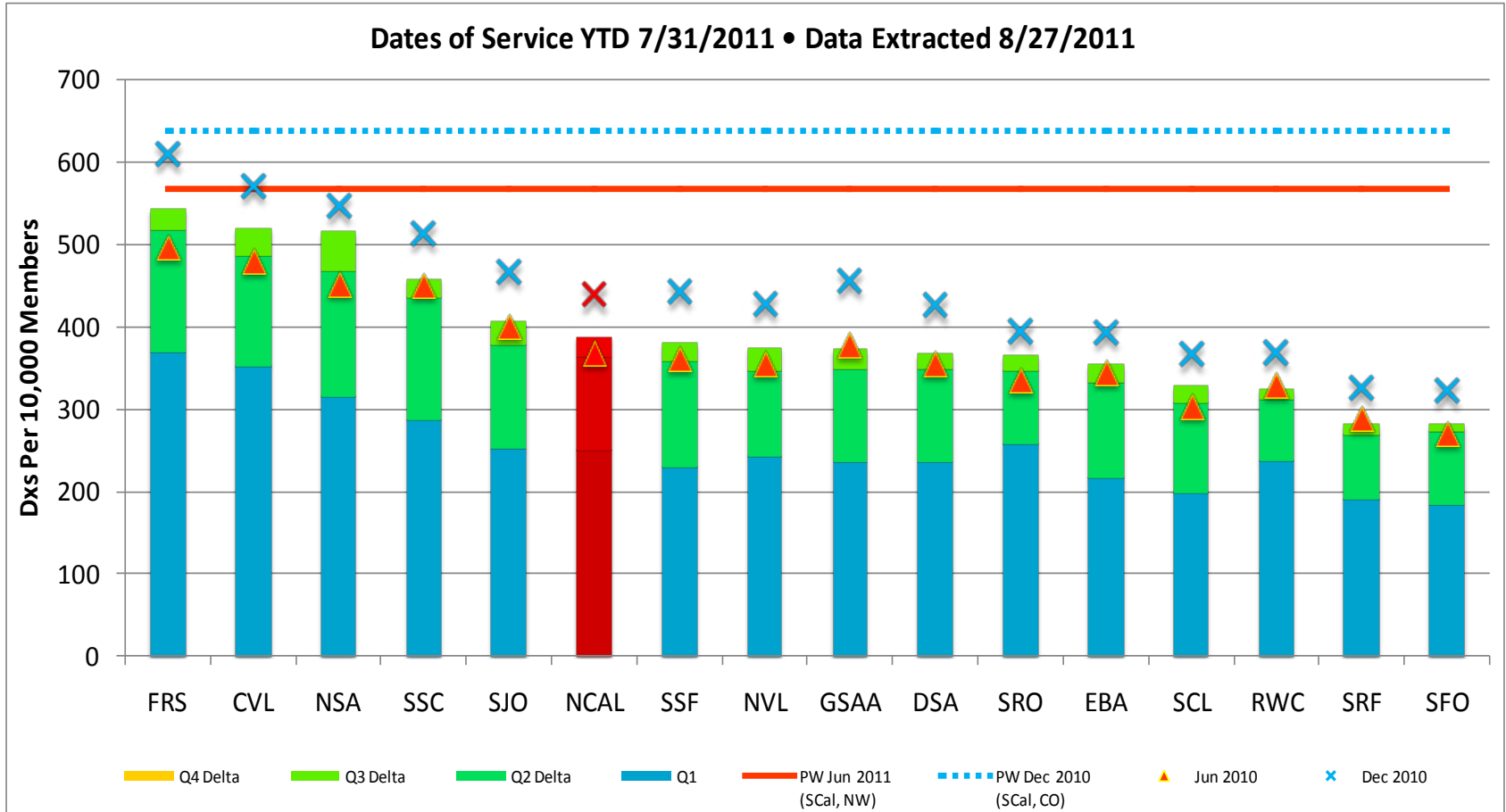
# Diabetes

# HCC 15: Diabetes w/ Renal or Peripheral Circulatory Manifestation



HCC15	SSF	SJO	SSC	NSA	CVL	GSAA	SFO	FRS	SCL	EBA	NCAL	NVL	RWC	DSA	SRO	SRF
Jul 2011	1,227	1,149	1,137	1,090	1,080	1,019	1,017	975	947	925	911	840	749	705	629	517
Jul 2010	1,117	1,073	1,085	952	1,002	1,020	936	917	892	886	861	805	706	685	596	504
Jul <sup>2</sup> 2009	1,082	1,038	902	884	987	969	823	822	829	743	768	654	669	575	526	421

# HCC 16: Diabetes w/ Neurologic or Other Specified Manifestation



HCC16	FRS	CVL	NSA	SSC	SJO	<b>NCAL</b>	SSF	NVL	GSA	DSA	SRO	EBA	SCL	RWC	SRF	SFO
<b>Jul 2011</b>	544	519	516	458	406	387	381	375	373	368	365	355	328	324	282	282
<b>Jul 2010</b>	498	481	453	452	401	369	363	356	379	356	336	345	304	329	289	270
<b>Jul 2009</b>	428	379	379	360	355	303	330	273	324	283	277	271	247	283	238	250

# Increased Capture of Diabetes Specificity

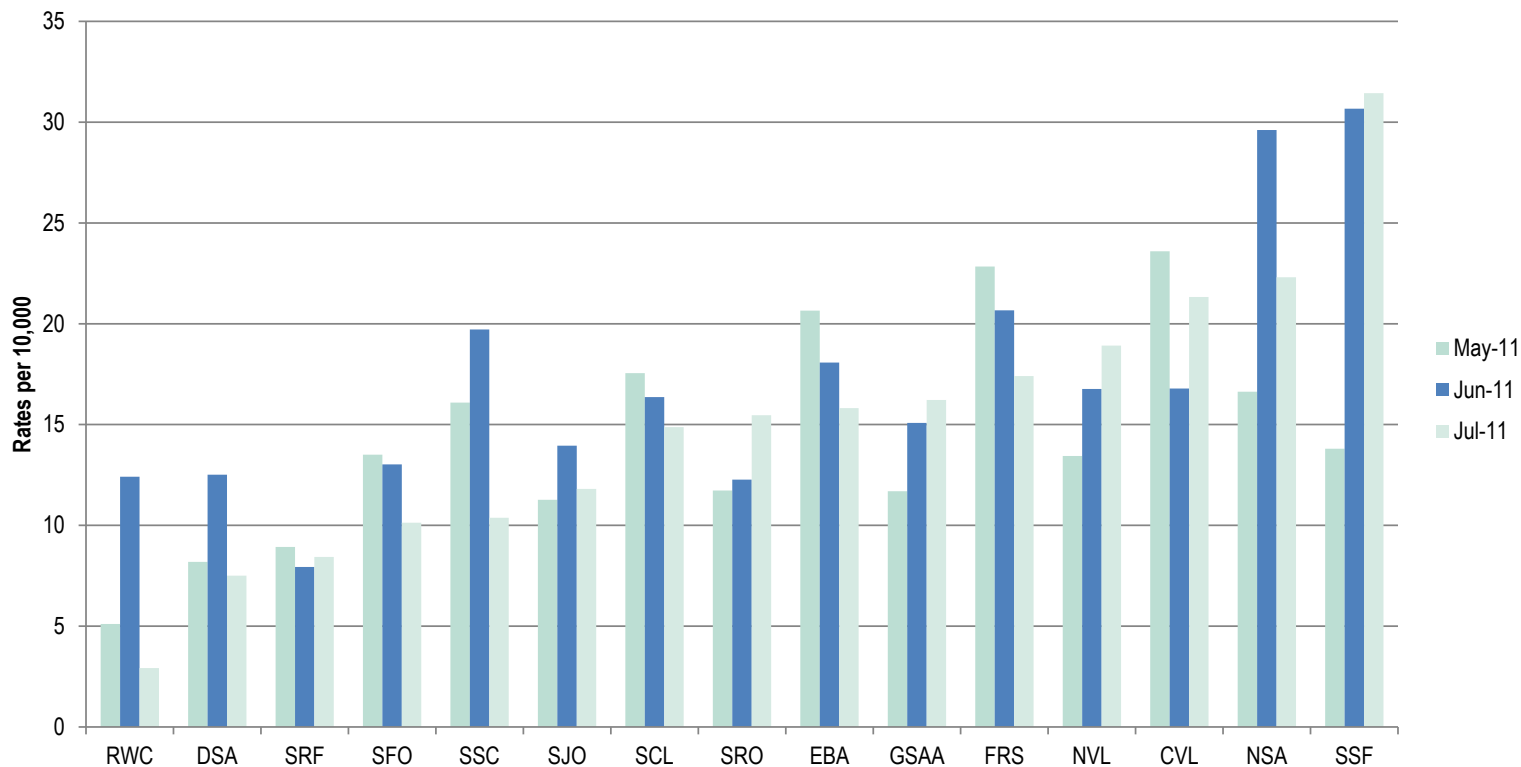
**Issue:** Expected increase in the capture of Diabetes HCC 15 and/or HCC 16 from implementation of Diabetes Questionnaire has not occurred.

## Discussion

- Have all Med Ctrs implemented Questionnaire?
- What are obstacles to implementation?
- How can obstacles been overcome?
- Are physicians aware of need to capture the higher specificity of Diabetes?

# HCC 16 - May, June, July 2011

First capture of HCC 16 for MA members with no HCC 16 in 2008-2010  
(sorted ascending based on July)

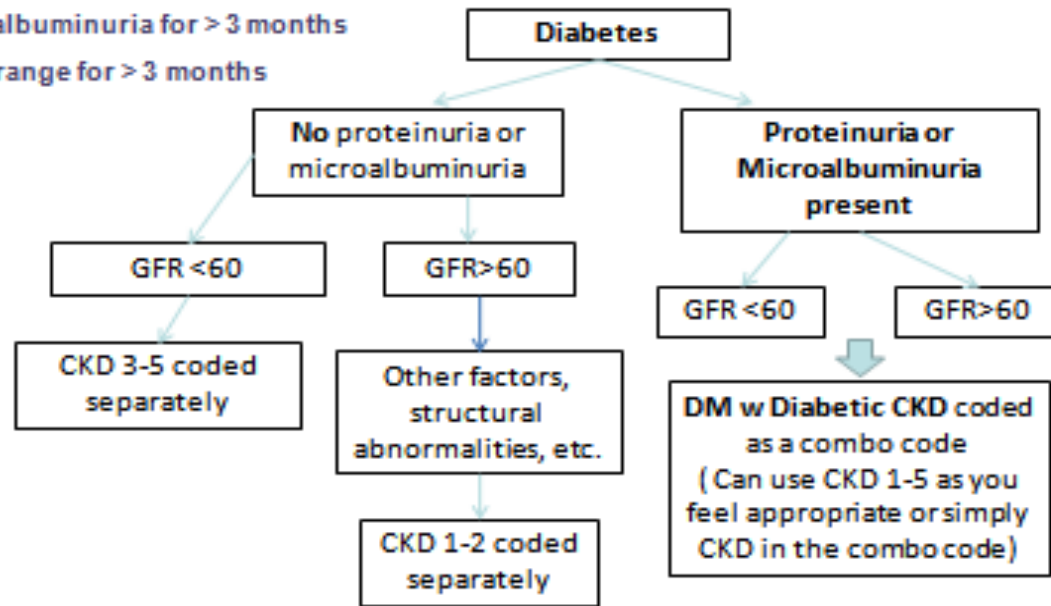


**CKD**

# Revised CKD Algorithm \*Nephrology Dept. in Agreement

## Diabetic CKD – Algorithm\*

- Proteinuria is defined as a protein/creatinine ratio greater than 0.2 for > 3 months, or an abnormal 24-hour urine protein result for > 3 months.
- Abnormal Microalbuminuria for > 3 months
- Abnormal GFRs range for > 3 months



2

*\*No longer need to factor in retinopathy in the decision*

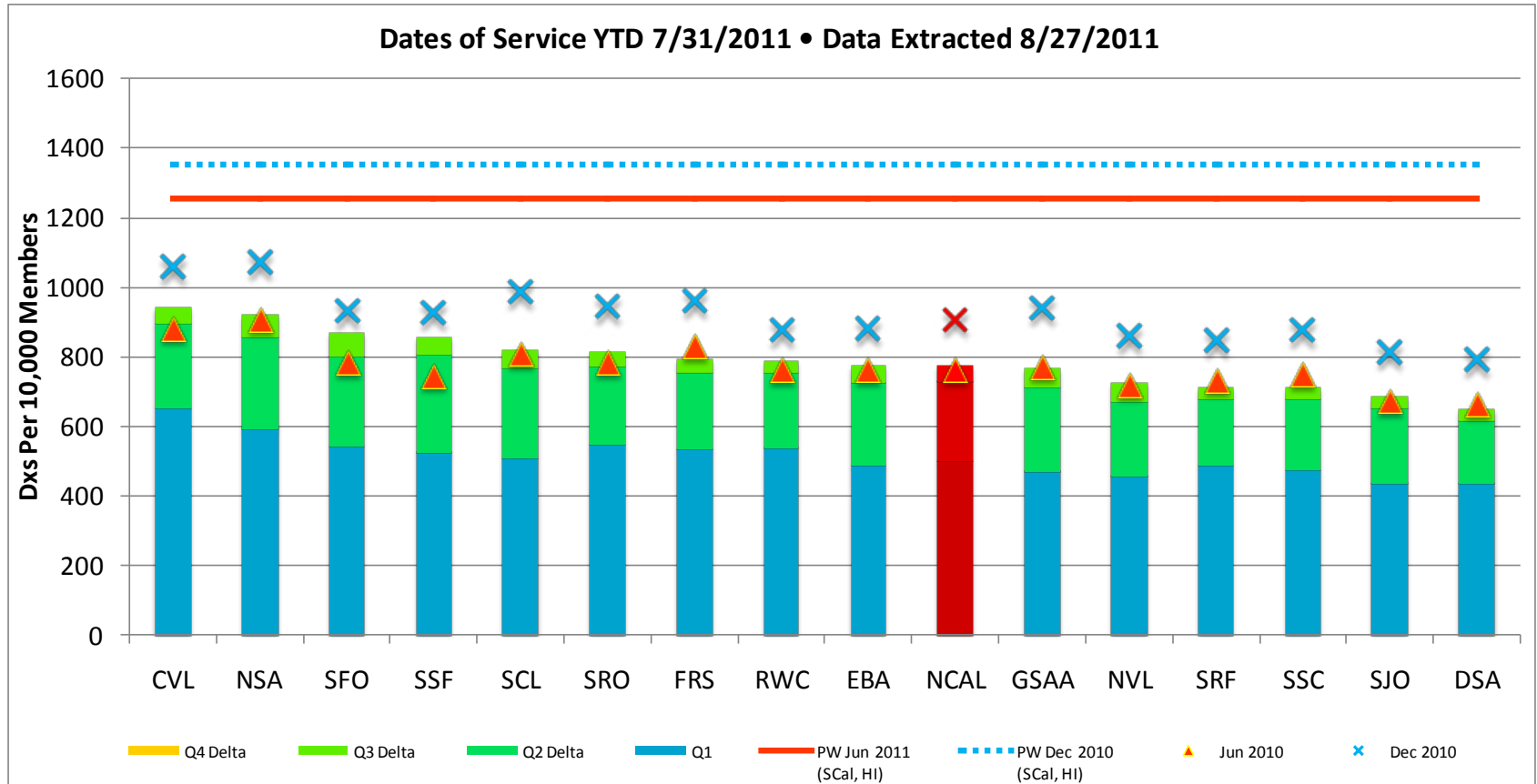


# Ncal – Only Region Using HCC 132 - Nephritis

HCCs by Region					
RATS Extract date:		8/20/2011			
Data Period :		1/1/2011 - 07/31/2011			
Region	Category	Description	Count	Members	Rate per 10,000 in Region
CO	HCC132	Nephritis	190	69,488	27
GA	HCC132	Nephritis	45	15,294	29
HI	HCC132	Nephritis	25	23,891	10
MA	HCC132	Nephritis	24	40,703	6
NC	HCC132	Nephritis	7,724	385,149	201
NW	HCC132	Nephritis	160	56,178	28
OH	HCC132	Nephritis	222	18,267	122
SC	HCC132	Nephritis	172	362,383	5

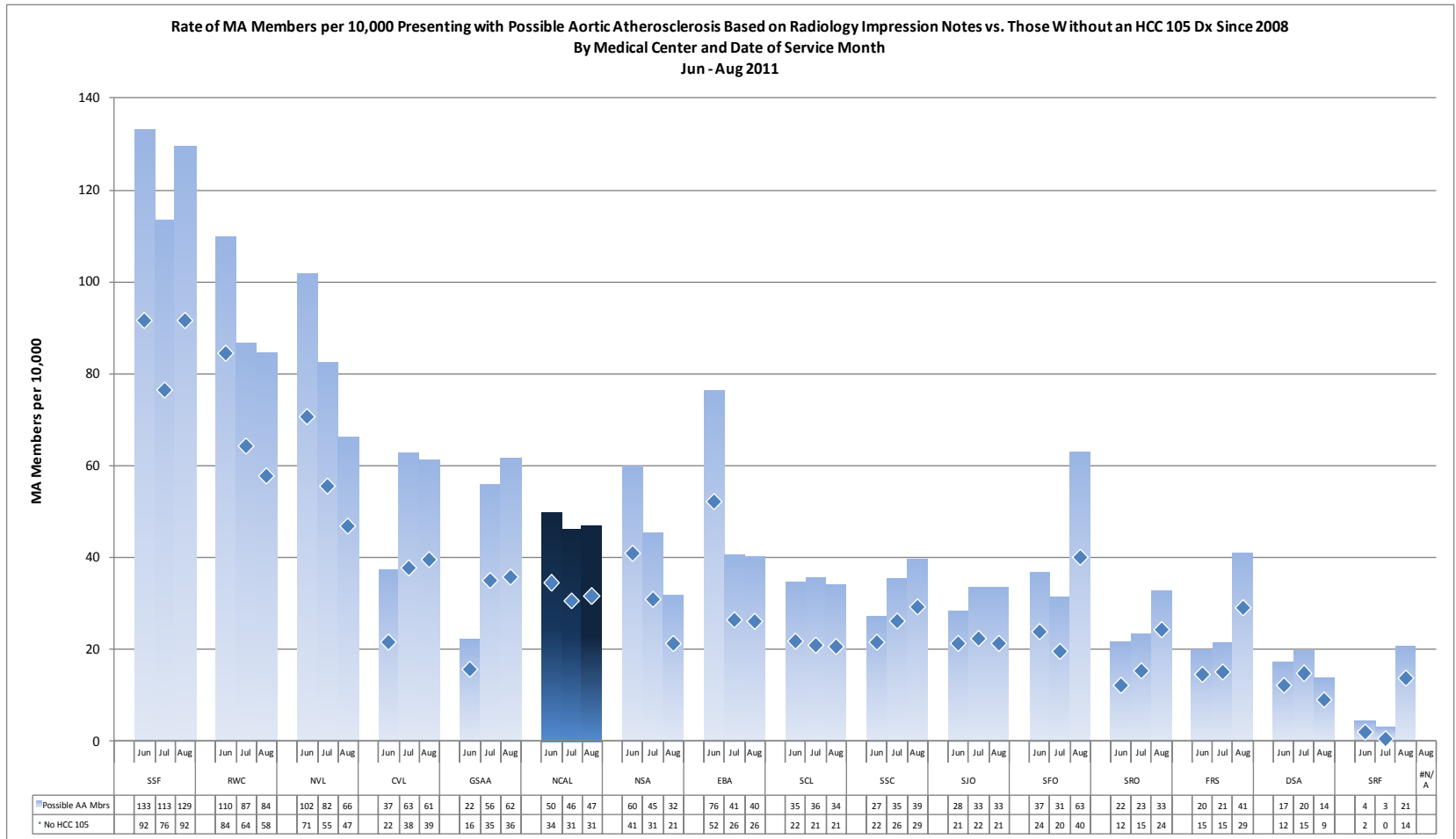
# Vascular Disease

# HCC 105: Vascular Disease



HCC105	CVL	NSA	SFO	SSF	SCL	SRO	FRS	RWC	EBA	NCAL	GSAA	NVL	SRF	SSC	SJO	DSA
Jul 2011	941	921	868	856	819	812	795	790	777	775	767	723	712	711	686	650
Jul 2010	883	908	784	746	811	783	833	763	763	764	772	719	733	749	673	665
Jul 2009	805	777	674	624	696	643	684	666	666	658	727	600	595	619	649	568

# Aortic Atherosclerosis



# Vascular Disease – Capture of Aortic Atherosclerosis

## Area of significant missed opportunity

### Review and Capture Process

- **Assure Radiologist** documents calcification in Aorta
- **Qtrly, Text parsing** locates records with potential diagnoses
- **Regional Clinical Team** reviews to ensure potential exists for diagnosis of Aortic Calcification
  - **Dx Prompts now on MDP as Data Mining**
  - Tracked separately / not added to Data Mining denominator
- **Treating Physician Captures Dx**
  - Reviews Radiology Impression Note
  - Evaluates and make diagnosis in Visit Note or Addendum or Stop Prompts, as appropriate

# Aortic Atherosclerosis (cont.)

## Issues for Clarification

- **PHASE Program** – Patient no longer automatically entered into PHASE, as of September, 2011
- Physician decides whether to add patient to PHASE

## Trainer and Physician Lead

- Assure Radiologist captures impression
- Remind Physicians to review Radiology Impression Notes
- Co-lead Training at Medicine Dept. meetings

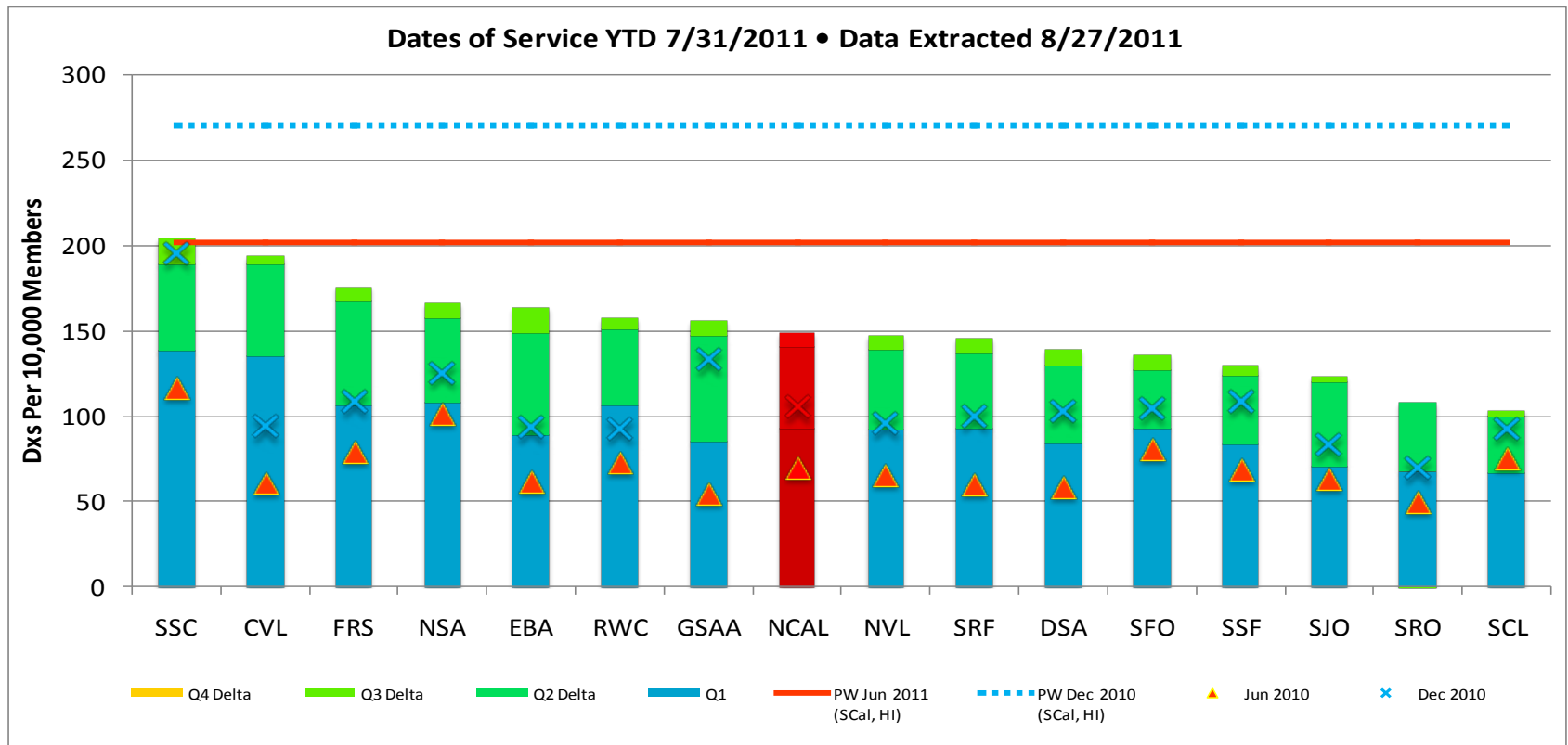
# NCAL vs SCAL Vascular Disease Capture Rates

HCC 105	Rates / 10 k
NCAL	775
SCAL	1332

Dates of Service YTD 6/30/2011 ~ Data Extracted 8/27/2011

# Protein Calorie Malnutrition

# HCC 21: Cachexia / Protein-Calorie Malnutrition



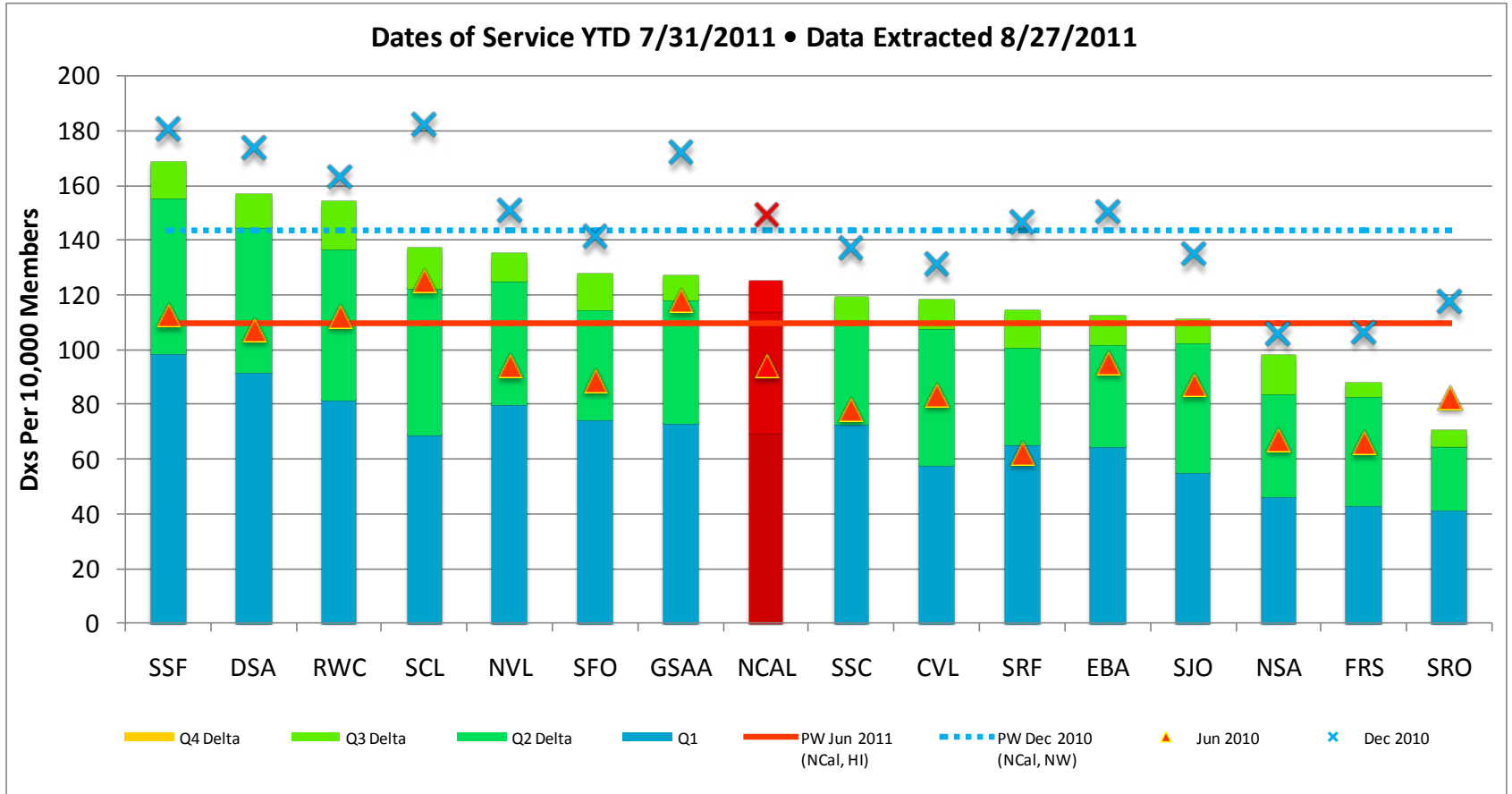
HCC21	SSC	CVL	FRS	NSA	EBA	RWC	GSAA	NCAL	NVL	SRF	DSA	SFO	SSF	SJO	SRO	SCL
Jul 2011	204	194	176	166	164	158	156	149	147	145	139	136	130	124	106	104
Jul 2010	117	61	79	102	62	73	55	70	66	60	59	81	69	64	50	75
Jul 2009	70	37	62	75	54	49	29	49	44	66	34	54	58	54	36	40

# Protein Calorie Malnutrition

## Actions Needed

- Coordinate local Med Ctr Work Group to monitor diagnosis capture process and metrics
  - Include: Registered Dietitian, Wound Care Nurse, CDI Physician Champion, Trainer
  - Monitor available metrics (RD and CDI Reports)
  - End-to-End reporting is being developed
  
- Continue Repeat Training
  - Inpatient
  - Ambulatory – continue to emphasize Cachexia

# HCC 2: Septicemia/Shock



HCC2	SSF	DSA	RWC	SCL	NVL	SFO	GSAA	NCAL	SSC	CVL	SRF	EBA	SJO	NSA	FRS	SRO
Jul 2011	169	157	154	137	135	128	127	125	119	118	115	112	111	98	88	70
Jul 2010	113	108	113	126	94	89	118	94	78	84	63	95	88	67	66	83
Jul 2009	67	58	61	79	40	46	64	54	52	41	47	52	60	56	59	34

# Other HCC Clarification

# Vertebral Fracture

## Diagnosis Clarification

- Chronic when on
  - long-term calcitonin
  - analgesic
  - or referral for evaluation of vertebralplasty

# Dementia – Memory Clinics

## Expect CMS to add back for 2012 dates of service

- Important to Develop / Enhance Memory Clinics to
  - Assist with making diagnosis of Dementia w/ Complications
  - Assure quality treatment and follow up for patient and care of family members

# Demonstration of Medicare Advantage Tracking Tool (eCode)

ERIC WANG, M.D. – North Valley Physician Lead

Joel Weiner, Dir. EIO Business Intelligence Team

Aileen Abrenilla, Manager BIT

**BREAK TIME**

# Encounter Coding Strategy

# Encounter Coding Strategy

- **Effective October 19<sup>th</sup> most encounters will require an E/M, Time-based LOS or Procedure Only Code**
  - Beginning January 1, 2012, CMS will require that organizations submit full claims data (the same data required for a Fee-for-Service patient) for each encounter with an MA patient.
  - Important components of claims data are E/M, Time-based LOS or Procedure Only codes
  - Without encounter codes, we could lose significant revenue
  - This should not be a problem for most of our clinicians because these codes are currently being assigned to more than 75% of all visits, not just those for which the BPA has fired. Many clinicians are already coding 100% of all their visits.
- **Hard Stop triggered by combination of Encounter & Provider Types**

# Required Provider Types for E/M, Time-based LOS and Procedure Only Codes

- **Provider Types to be Included in Phase 1 – October 19th**

- Physicians – part-time and pool
- Podiatrists
- Physician Assistants
- Nurse Practitioners \*
- Optometrists \*
- Maxillofacial Surgeons

\* Pending further leadership discussions

- **Provider Types to be Included in Phase 2 (BPA will continue to fire on billable encounters \*\*) - date to be determined**

- Psychologists \*\*
- LCSWs \*\*
- Continuum of Care Providers
- Allied Health Professionals who provide 'incident to' services – RN, Marriage Family Therapists, etc..
- Residents in the Ambulatory setting to be evaluated prior to Phase 2

**\*\*Note if Phase 2 is implemented after January 1, 2012 , the BPA will expanded to MA billable encounters**

# Required Encounter Types for E/M, LOS and Procedure Only Codes

- **Encounter Types to be Included in Phase 1 – October 19th**
  - Office Visits
  - Office Visit - Workers Comp and Workers Comp MH/BH
  - Office Visit - Chemical Dependency
  - Office Visit - MH/BH
  - Office Visit - Adolescent
  - Confidential Visit – Adult, Adolescent
  - Pre-Op Visit
- **Encounter Types to be Included in Phase 2 – date to be determined**
  - Office Visit – OB
  - CLIN DOC (e.g. for Rad Onc)
  - Continuum of Care
  - Allied Health
- **TAVs will continue to be Excluded**

# Clarifications for Coding

- **Consults** – Designation is no longer recognized by CMS and is already removed as an option in KPHC. These will be coded using the standard E/M codes for office visits (99201-99215).
- **New vs Established** – No longer requires provider selection. Now identified by KPHC via EPIC functionality or Revenue Cycle edits
- **Preventive Codes** – Option has been added as a ‘drop down’ selection in KPHC making codes easier to find in provider workflow.

## Clarification for Coding (cont)

- **Procedure Only Visits**
  - Use “PROCEDURE ONLY” - formally labeled as “NO LOS REQUIRED”
  
- **Global Services** - Bundling of charges will be managed by Revenue Cycle; Providers will not need to know global period
  
- **Modifiers** – Providers no longer required to capture Modifiers; Modifiers will no longer be available for selection - with exception of Modifier 57 Decision for Surgery. Will be captured/assigned in Revenue Cycle edits

# E/M Training and Reporting

## ■ Training

- Updated Materials Available
- Training Priority based on Provider / Dept. Coding Completion Reports
- Collaboration with KPHC Site Support
- Documentation & Coding Lead Role
  - Assure that all Providers have received Leadership Message regarding Hard Stop
  - Support Trainers in getting time on Dept or Module meetings for training

## ■ Reporting

- Monthly encounter closure reports will be sent to PIC's, by department and provider, to monitor encounters not meeting the 48 hour closure requirement

# CELEBRATION TIME !!!



# APPENDIX

# Cancer Accuracy Rates and Volumes

LMC	Jan 2010 Dates of Service			Jul 2011 Dates of Service		
	Accuracy Rate	Dxs Evaluated	Dxs Loaded	Accuracy Rate	Dxs Evaluated	Dxs Loaded
CVL	64.2%	695	950	91.6%	476	523
DSA	72.4%	1,055	1,768	92.2%	1,004	1,030
EBA	74.6%	485	790	89.9%	605	617
FRS	66.9%	507	707	94.5%	398	402
GSAA	73.2%	497	938	94.4%	591	612
NSA	65.6%	497	716	89.6%	537	553
NVL	73.1%	1,744	2,391	89.8%	1,214	1,347
RWC	77.8%	406	607	91.7%	288	313
SCL	74.1%	902	1,419	90.8%	885	926
SFO	77.3%	392	641	93.7%	398	403
SJO	72.2%	353	621	88.5%	321	337
SRF	71.2%	559	785	89.2%	351	380
SRO	78.1%	543	692	89.7%	359	375
SSC	68.4%	471	650	94.1%	372	419
SSF	81.0%	567	840	95.6%	432	539
NCAL	72.6%	9,673	14,515	91.5%	8,231	8,776

# CVA Accuracy Rates and Volumes

LMC	Jan 2010 Dates of Service			Jul 2011 Dates of Service		
	Accuracy Rate	Dxs Evaluated	Dxs Loaded	Accuracy Rate	Dxs Evaluated	Dxs Loaded
CVL	5.1%	39	44	9.1%	11	14
DSA	14.7%	95	98	53.3%	15	17
EBA	31.9%	47	50	25.0%	20	23
FRS	20.0%	30	34	55.6%	9	12
GSAA	45.7%	35	39	21.4%	14	16
NSA	28.9%	45	46	71.4%	7	10
NVL	23.5%	98	103	35.0%	20	24
RWC	11.8%	34	37	66.7%	3	3
SCL	5.9%	85	90	16.7%	12	12
SFO	28.6%	28	31	50.0%	6	8
SJO	25.9%	27	31	60.0%	5	6
SRF	21.9%	32	33	14.3%	7	10
SRO	20.5%	44	50	14.3%	7	10
SSC	17.0%	47	49	75.0%	4	11
SSF	48.3%	29	32	50.0%	2	9
<sup>44</sup> NCAL	21.1%	715	767	35.2%	142	185

# FX Accuracy Rates and Volumes

LMC	Jan 2010 Dates of Service			Jul 2011 Dates of Service		
	Accuracy Rate	Dxs Evaluated	Dxs Loaded	Accuracy Rate	Dxs Evaluated	Dxs Loaded
CVL	2.1%	47	53	38.9%	18	28
DSA	9.3%	86	94	30.6%	36	41
EBA	18.3%	71	72	44.4%	27	30
FRS	29.3%	41	42	28.6%	14	16
GSAA	17.8%	45	59	57.9%	19	19
NSA	10.0%	50	52	66.7%	12	12
NVL	19.9%	156	162	64.9%	37	45
RWC	16.1%	31	32	83.3%	12	14
SCL	16.5%	79	88	42.5%	40	45
SFO	14.6%	48	50	80.0%	15	16
SJO	21.7%	46	47	54.5%	11	12
SRF	10.5%	57	57	100.0%	1	4
SRO	13.5%	52	52	28.6%	14	18
SSC	17.9%	28	28	60.0%	5	9
SSF	11.4%	44	44	60.0%	5	8
NCAL	15.4%	881	932	50.0%	266	317

# **EXHIBIT 10**

# June 16<sup>th</sup>, 2015 RRG WebEx

<b>Time (PT)</b>	<b>RRG Agenda Topic</b>	<b>Discussion Leader</b>
12:00pm 12:05pm	Introductions, Agenda Review, & Announcements	Simon Cohn, MD Hovannes Daniels Cindy Love
12:05pm 12:25pm	ICD-10 Update	Dr. Tom Hartman Ed Kho
12:25pm 12:35pm	ACA Analytics Status	Sandra Lopez
12:35pm 12:55pm	ACA Submission Status	Christy Lu
12:55pm 1:10pm	2014-2015 Risk Score Update	Leanne Powell
1:10pm 1:25pm	Comparison of RATS to Encounter Data	Jialin Gu
1:25pm 1:30pm	Wrap-up and Upcoming Events	Simon Cohn, MD Hovannes Daniels Cindy Love

# ICD-10 Update



## Part II : ICD-10 Readiness for Risk Adjustment Risk Adjustment Analytical review

June 16, 2015

Tom Hartman, M.D.

Edward Kho

## Overview

What are the preparation plans for ICD10?

Two major efforts:

a) Risk Score Impact:

- Assess impact of ICD9 to ICD10 to no HCC?
  - Fine tune ICD9 to ICD10 to EDG terms mapping

b) ICD10 Monitoring

- Develop plan:
  - Identify reporting of volume/errors
  - Establish teams to triage ICD10 issues
  - Identify relevant Risk Adjustment metrics (existing & new ) to spot ICD10 related deficiencies

# Risk Score Impact Analysis

## Conduct Analysis

Focus of work with CMT/RA Analytics:

ICD9 to ICD10		
Groupings	ICD9 count	ICD10 count
icd9 to icd10 <u>do</u> map to (ICD10) HCC	2,926	10,904
icd9 to icd10 <u>do not</u> map to (ICD10) HCC	8,961	54,529
icd9 to icd10	10,888	65,434

ICD9 to ICD10 to EDG terms		
Groupings	ICD9 count	EDG Term count
icd9 to icd10 /w EDG terms	10,888	184,769
icd9 to icd10 <u>do not</u> map to (ICD10) HCC with EDG terms	8,961	156,706
icd9 to icd10 <u>do not</u> map to (ICD10) HCC with EDG terms /w freq	182	861

## Risk Score Impact Analysis (2)

### Conduct Analysis

Common icd9 to idc10 to no HCC labeled "OK":

- Combo code and other code in HCC
- Subsequent or Sequela diagnosis
- Non-Medicare related Diagnosis

Group	examine	ok	Total ICD9 cohorts
Group 1: >500	12	41	53
Group 2: 200-499	5	13	18
Group 3 : 100-199	3	19	22
Group 4 : <100	39	50	89
<b>Total ICD9 cohorts</b>	<b>59</b>	<b>123</b>	<b>182</b>

## Coder and Physician Modeler Review and Analysis (2)

Investigate ICD9 to ICD10 and how it relates to HCC

Example 1: Vascular Disease

icd9 code	EDG CID	EDG Display Name	icd10 code	ICD10 Descriptions	ICD9 HCC	ICD10 HCC	ICD9 Frequency
440.20	121141070	Atherosclerosis of right leg	I70.201	ATHEROSCLEROSIS	108	108	1,219
440.20	121141071	Atherosclerosis of left leg	I70.202	ATHEROSCLEROSIS	108	108	1,219
440.20	121141072	Atherosclerosis of bilat legs	I70.203	ATHEROSCLEROSIS	108	108	1,219
440.20	121141330	Right brachiocephalic artery stenosis	I70.8	ATHEROSCLEROSIS	108	no hcc	1,219
440.20	121141331	Left brachiocephalic artery stenosis	I70.8	ATHEROSCLEROSIS	108	no hcc	1,219

- Verify ICD9 to ICD10 coding
- Check for other available EDG terms to get us HCC 108

**Result:** Good news ! Coders re-map to I70.208: Unspecified atherosclerosis of native arteries of extremities, other extremity

- ICD10 I70.208 maps to HCC108

## Coder and Physician Modeler Review and Analysis

Investigate ICD9 to ICD10 and how it relates to HCC

- a) Verify coding: Validate ICD9 to ICD10 ✓
- b) Conduct Coder review ✓
- c) Physician CMT Modeler review
  - a) Do we need to add or edit terms in EDG file?
  - b) Consider other what other ICD10 to get to HCC?
  - c) Do we need to change EDG term to map to HCC?

Group sets	icd9 code	EDG terms
Set 1 : >500	12	40
Set 2: 200-499	5	25
Set 3: 100-199	3	8
Set 4: <100	39	82
Total:	59	155

# Benefits

Benefits to this exercise:

- 1) Fine tune EDG Term describing ICD9 to ICD10
- 2) With Coding corrections and EDG terminology review – mitigate ICD9 to ICD10 to no HCC mapping
- 3) Potential to improve use of ICD10 Diagnosis calculator

Example: Major Depressive Disorder



Display Name	ICD9	ICD10	Total KP Encounters over 2 years
MAJOR DEPRESSIVE DISORDER, RECURRENT EPISODE	296.3	F33.9	1,579,054
MAJOR DEPRESSIVE DISORDER, RECURRENT EPISODE, MODERATE	296.32	F33.1	433,088
<b>MAJOR DEPRESSIVE DISORDER, SINGLE EPISODE</b>	<b>296.2</b>	<b>F32.9</b>	<b>343,435</b>
MAJOR DEPRESSIVE DISORDER, RECURRENT EPISODE, IN FULL REMISSION	296.36	F33.42	263,308
MAJOR DEPRESSIVE DISORDER RECURRENT EPISODE, IN PARTIAL REMISSION	296.35	F33.41	171,897
MAJOR DEPRESSIVE DISORDER, RECURRENT EPISODE, MILD	296.31	F33.0	136,895
MAJOR DEPRESSIVE DISORDER, SINGLE EPISODE, MODERATE	296.22	F32.1	106,732
MAJOR DEPRESSIVE DISORDER, RECURRENT EPISODE, SEVERE	296.33	F33.2	97,352
MAJOR DEPRESSIVE DISORDER, SINGLE EPISODE, IN FULL REMISSION	296.26	F32.5	63,530

## Benefits (2)

Display Name	ICD9 code	ICD10 code	Total KP use over 2 years
DEPRESSION, UNSPECIFIED	311	<b>F32.9</b>	619,919
MAJOR DEPRESSIVE DISORDER, SINGLE EPISODE	296.2	<b>F32.9</b>	343,435
DEPRESSIVE DISORDER	311	<b>F32.9</b>	137,783
MOOD DISORDER WITH DEPRESSIVE FEATURE	296.2	<b>F32.9</b>	25,379
SENILE DEMENTIA WITH DEPRESSION	290.21	F03.90, <b>F32.9</b>	2,482
REACTIVE DEPRESSION	300.4	<b>F32.9</b>	2,223
MULTI INFARCT DEMENTIA WITH DEPRESSION	290.43, 437.0	F01.50, <b>F32.9</b>	125
PRESENILE DEMENTIA WITH DEPRESSION	290.13	F03.90, <b>F32.9</b>	119

# Proposed Major Depression Calculator

Database Matches

Match:  Find

ID	Name	Code	Code Set
900000	MAJOR DEPRESSIVE DISORDER (TEST)		

Select a more specific diagnosis in order to bill for your work

Calculator List

Depressive episode:  Single episode  Recurrent episode

Current severity:  Mild  Moderate  Severe  Psychotic features  Partial remission  Full remission  Unspecified severity

Depressive specifiers:  Mixed features  Seasonal pattern  Anxious stress  Peripartum onset  Catatonia

Visit Diagnosis: MAJOR DEPRESSIVE DISORDER, SINGLE EPISODE, IN FULL REMISSION

Preference List (F5) Accept Cancel

1 Loaded. No more to load.

## Physician Modeler Review and Analysis

Investigate ICD10 to HCC with no EDG Terms

- Physician CMT Modeler review:
  - Review 2364 ICD10 codes in HCC model but with no current EDG term

Examples:

Question – should we add terms?

Many codes on the list are related to “unspecified” laterality

icd10_code	description
C40.80	Malignant neoplasm of overlapping sites of bone and articular cartilage of unspecified limb
C40.90	Malignant neoplasm of unspecified bones and articular cartilage of unspecified limb
C69.20	Malignant neoplasm of unspecified retina
D68.8	Other specified coagulation defects
D70.8	Other neutropenia
D83.8	Other common variable immunodeficiencies
E08.311	Diabetes mellitus due to underlying condition with unspecified diabetic retinopathy with macular edema
F33.40	Major depressive disorder, recurrent, in remission, unspecified
S98.149A	Partial traumatic amputation of one unspecified lesser toe, initial encounter
Z89.419	Acquired absence of unspecified great toe

# Timing

## Risk Score Impact Timing – ETA July 2015

	Start	End	Deliverable	Participants
Data analysis	7-May	13-May	Integrate i9 to i10 to i9/hcc and i10 /hcc	Edward Kho & Ken Nelson
Mapping Review	14-May	1-Jun	Review and assess i9 to i10 to no i10/hcc	Dr T Hartman & Edward Kho
Coder and Physician modeler Review	5-Jun	17-Jun	Conduct deeper review of i9 to i10 to no i10/hcc	Dr T Hartman & coder team
CMT release date	18-Jun	21-Jul	change to master file (7/18) and regional production (07/21)	Dr T Hartman and team
Data analysis	21-Jul	24-Jul	re-run analysis and assess risk score impact	Rita Barsoum, Ken Nelson & Edward Kho

## Timing (2)

### ICD10 Monitoring – ETA Aug 2015

	Start	End	Deliverable	Participants
Data extract - Clarity	15-Jun	19-Jun	Pull Claims data extract with ICD9/ICD10 for Reporting team.	Andy A./Julie Q.
Identify reports to monitor Volume/Rejections	22-Jun	26-Jun	identify all KPMETA and rejection reports. Establish access to claim level detail.	Risk Adjustment Work group
Identify reports to monitor Risk Adjustment Metrics	22-Jun	26-Jun	identify all existing Risk Adjustment reporting - Risk scores, HCC, PMPM to monitor completeness.	Risk Adjustment Work group
Adjust reporting requirements	29-Jun	3-Jul	Define existing or produce new metrics.	Ed K., Ken N., Gary B., Jialin G., Julie Q.
Produce pro-forma report deck	6-Jun	3-Aug	Establish reporting deck to monitor pre vs post cutover	Ed K., Ken N., Gary B., Jialin G., Julie Q.

# ACA Analytics Status

- Identifying New ACA Members with Conditions
- ACA Benchmark Comparison (Understanding our Membership)
- Understanding ACA Enrollment Patterns / Analysis of Churn

# Identifying New ACA Members with Conditions

## ■ Background

- Use vendor database to supply condition information on new-to-KP and existing members. Implement an “overlap” test run of membership to the vendor database to determine fit of our membership to vendor’s financial/insurance oriented data.

## ■ Status Update

- KP had contracted with MIB to conduct a pilot study
- MIB has discontinued this product offering to new clients
- MIB database no longer an option for KP

## ■ Next Steps

- Evaluating new vendor solutions
  - The Milliman AlertRx system is a tool for payers to optimize their risk adjustment revenue by instantly identifying potential HCCs for members as well as proactively identifying and enrolling high cost members into case management (CM) or disease management (DM) programs.

# ACA Benchmark Comparison (Understanding our Membership)

- Background

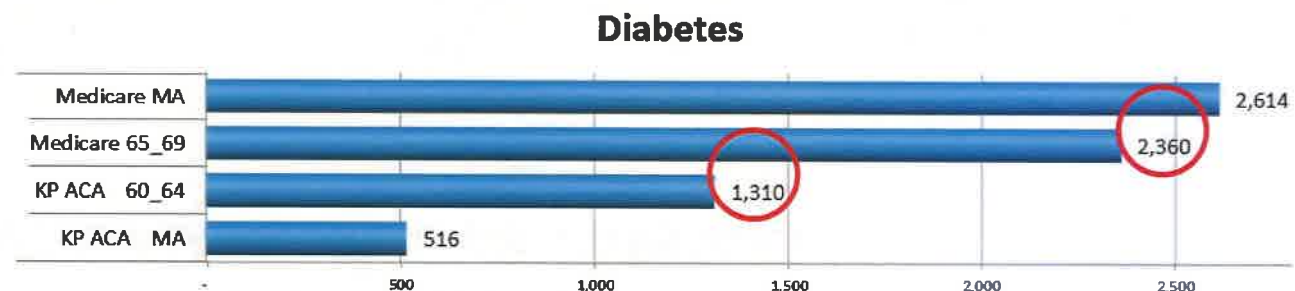
- How do ACA HCC rates per 10K compare to Medicare populations, and Wakely benchmarks when the ACA model is run on each population?
  - Closely examine the ACA 60-64 year olds with the Medicare 65-69 year olds

- Status Update

- Preliminary analysis complete: Medicare membership run through ACA model.

- Next Steps

- Exec. Brief (July)
- All ACA HCCs
- Regional View



program wide results, 2014 data, 03/21/15 extract, silver coefficients

# Understanding ACA Enrollment Patterns / Analysis of Churn

## ■ Background

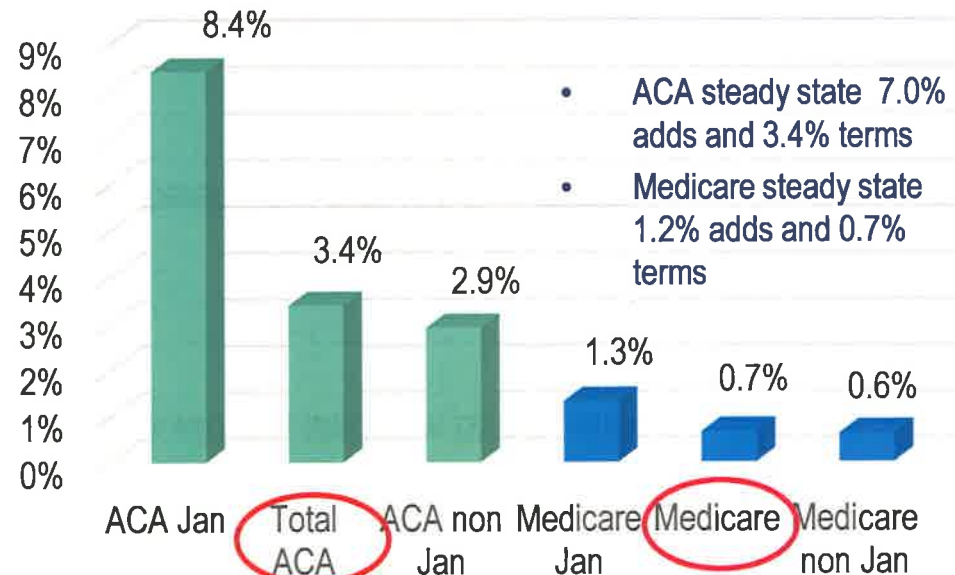
- Understanding differences in enrollment, disenrollment, and stable enrollment.
  - How sticky are the ACA members compared to Medicare?

## ■ Status Update

- Adds/Terms calculations performed at regional level
- Analysis underway

## ■ Next Steps

- Executive Brief (July)
- Regional Views with Highlights



# ACA Submission Status

# ACA Submission Status

## HHS Update:

- HHS closed submissions on 5/15
  - Currently in 'Blackout' period, meaning no 2015 data can be sent to the Edge Server
  - CMS will reopen submissions for 2015 data at a later date (expected late June / early July)
  - Supplemental Submissions
    - Over 18K supplemental diagnoses submitted
  - Enhancements and break fixes underway during transition from project to operations, planned through August. Analysis underway of data submission results.

	Accepted Claims	Rejected Claims	Percentage Rejected
<b>Medical</b>	5,318,055	39,676	0.75%
<b>Pharmacy</b>	3,554,660	2,040	0.06%

## Risk Score Accuracy and Completeness:

### Future Enhancements

- EDGE Server team continues enhancements and Phase 2 development initiatives to expand system functionality
  - Includes Automation, Standardization of Production and Operations, Enhancements for Efficiency

### Reporting

- Comprehensive analytic reporting capability still in definition
- Scope evaluation in progress to define requirements. Targeting multiphase approach.
- Expanded operational reporting functionality continuing to roll out

# Formal Discrepancy Reporting – Final

- CMS has established a process to file discrepancies that Issuers find in CMS RA/RI reports
  - Team filed final discrepancies with CMS on 6/1/15
- Per CMS guidance and request, project focused on evaluating CMS calculations in seven RA/RI reports
  - Comparison analysis of detailed report lines, identifying where KP calculation differs from CMS calculation
  - Deep dive analysis to understand drivers of discrepancies
  - KP files discrepancy reports to CMS for their review; CMS determines if reports have errors and should be remediated
- In process
  - Waiting for CMS response on discrepancies
  - Reviewing / debriefing the project for standardizing the process, and plan for future

# Formal Discrepancy Reporting – Findings

## Results:

Report	Content	Results
RACSD report	RA Claims Selection detail	-10.9M claim lines match at the claims header level - <b>Only 158</b> claims lines present on CMS but not on KP
RARSD report	RA Risk Score detail	-1.1M records. - <b>99.92%</b> match between KP report and CMS report
RIDE report	RI Enrollee detail	- Difference between CMS calculation and KP calculation is <b>~13K</b> .
RATEE report	RA Transfer Elements	-No significant differences identified from RATEE report.  i) Plan liability risk score difference: the average difference is <b>-0.0002</b> ii) Allowable rating factor difference: the average difference is <b>-0.0004</b> iii) Plan's age adjusted average premium difference: the average difference is <b>0.0536</b>
RISR report	RI summary	- Completed. <b>No variance</b>
RACSS report	RA Claims summary	- Completed. <b>No variance</b>
RARSS report	RA Risk Score summary	- Difference identified from RARSS report is derived from the difference identified from RARSD report. There is no financial impact of this report.

# Reinsurance Recovery Estimates

- Submission completed for 2014

Regions	Est. As of 12/31/2014	Current Est.	Diff to Dec 2014
California	\$186	\$192	\$6
Colorado	\$19	\$22	\$2
Georgia	\$5	\$6	\$1
Hawaii	\$4	\$4	\$0
MidAtlantic	\$5	\$6	\$1
Northwest	\$9	\$10	\$1
<b>Totals</b>	<b>\$228</b>	<b>\$240</b>	<b>\$12</b>

Notes: - \$ in Million

- Current Est. is KP's calculation based on CMS run as of 5/15/2015.

# 2014-2015 Risk Score Update

## Medicare

## 2014 Risk Score is above budget program-wide

2013 and 2014 scores calculated under the 2015 payment blend (67%/33%)

- Most regions are already above budget.
  - Regions are now focusing on retroactive initiatives (data mining, NLP, chart reviews) for 2014 data. The CMS deadline for submission of 2014 encounters is January 31, 2016. Please work with your regional submission team to determine internal KP submission deadline.

### 2014 Part C Risk Scores for 2015 MA Revenues

	2013 Actual	2014 Score 4/18/2015 Extract	2014 Score 5/23/2015 Extract	2014 v 2013	2014 Budget	Variance	Remaining Initiatives for 2014 Encounters
Colorado**	1.1451	1.1735	1.1581	0.0130	1.1808	-0.0227	NLP
Georgia	0.9855	1.0577	1.0536	0.0681	1.0512	Above Budget	
Hawaii	1.0382	1.0594	1.0601	0.0218	1.0590	Above Budget	NLP
Northern California	1.1604	1.1834	1.1830	0.0226	1.1761	Above Budget	NLP; External claims review; Inpatient Dec-Jan crossover review
Northwest	1.0954	1.1187	1.1187	0.0233	1.1142	Above Budget	NLP
Southern California	1.1414	1.1658	1.1654	0.0240	1.1505	Above Budget	NLP
<b>MA Regions*</b>	<b>1.1415</b>	<b>1.1662</b>	<b>1.1658</b>	<b>0.0243</b>	<b>1.1571</b>	<b>Above Budget</b>	
Mid-Atlantic	0.9277	0.9653	0.9654	0.0378	NA	NA	

Updated 05-23-2015

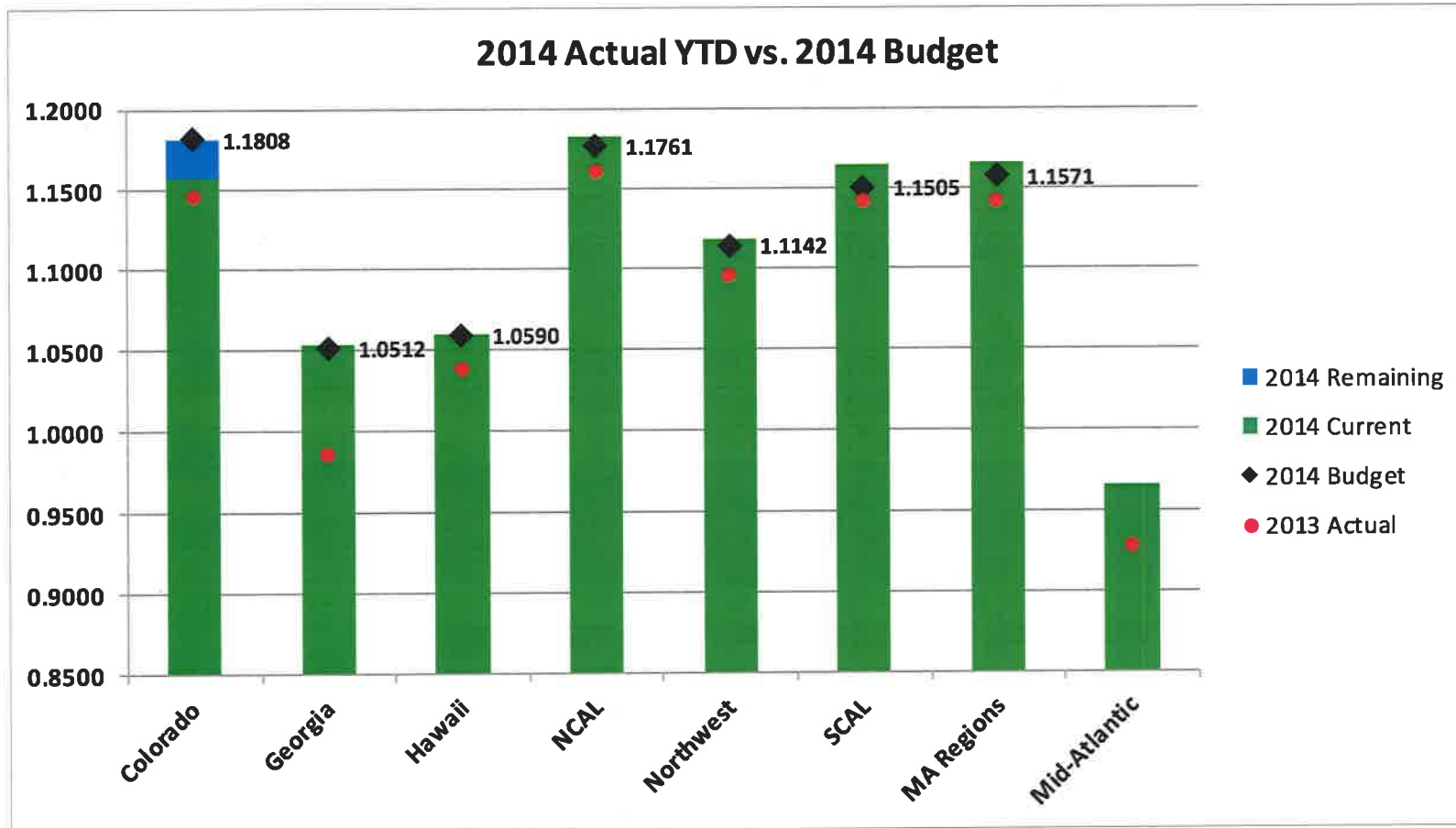
\* The MA Regions risk score is an average of the regional risk scores, weighted by proportion of membership

\*\* Colorado 2014 score is from 5/30/15 extract

2014 data are not final. Final submission deadline is January 31, 2016

# 2014 Risk Score Improvement Targets by Region

2013 and 2014 scores calculated under the 2015 payment blend (67%/33%)



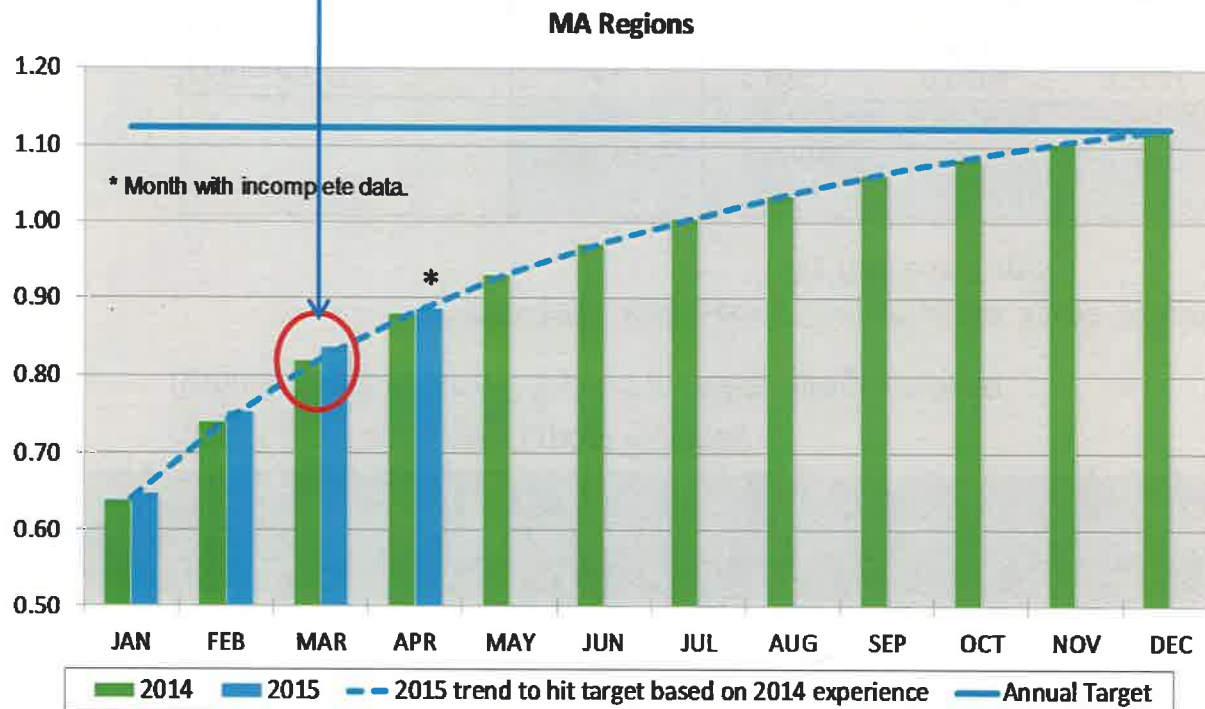
2014 data are not final. Final submission deadline is January 31, 2016.

Medicare

# 2015 Program-wide YTD Risk Score

This slide shows 2014 and 2015 scores under the 2014 model, which CMS will use for 2016 payments.

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2014	0.6394	0.7402	0.8195	0.8800	0.9305	0.9713	1.0049	1.0357	1.0628	1.0847	1.1047	1.1205
2015	0.6482	0.7534	0.8361	0.8871								
Change	0.0088	0.0133	0.0165	0.0071								
Trajectory	0.6409	0.7419	0.8214	0.8821	0.9327	0.9736	1.0072	1.0381	1.0653	1.0872	1.1073	1.1231
Target												1.1231
Target Increase												0.0026



Through March dates of service, risk score is ahead of last year by 1.6 points. Current target is for a 0.26 point increase over year end 2014 score.

2014 data are not final. Final submission deadline is January 31, 2016.

## 2015 Risk Score Improvement by Refresh Type

This slide shows 2014 and 2015 scores under the 2014 model, which CMS will use for 2016 payments.

### 2015 Program-wide MA risk score YTD is above prior year by 1.6 points

- Higher than last year in most Regions
- Annual target is for a 0.3 point increase program-wide

#### YTD 2015 Risk Score **Compared** to Same Months of 2014 By Refresh Type

	DOS Thru Date	Refresh Type			2015 YTD vs. 2014 Same Months	2015 Annual Budget Imprvm't (2)
		Chronic Refresh	New HCCs	Other (1)		
Colorado	Mar	0.0171	0.0054	0.0014	0.0239	0.0196
Georgia	Mar	0.0405	0.0100	0.0094	0.0599	0.0369
Hawaii	Mar	(0.0090)	(0.0080)	(0.0036)	(0.0206)	0.0008
Mid-Atlantic	Mar	(0.0063)	0.0108	(0.0008)	0.0037	NA
Northern California	Mar	0.0138	(0.0003)	0.0040	0.0175	0.0033
Northwest	Mar	0.0239	(0.0012)	0.0030	0.0257	0.0197
Southern California	Mar	0.0102	(0.0035)	0.0089	0.0156	(0.0007)
MA Regions	Mar	0.0132	(0.0020)	0.0053	0.0165	0.0030

Updated 05-23-2015

(1) Including non-chronic refresh, refresh of HCCs for new-to-KP members, and demographics.

(2) Improvement compared to current 2014 scores.

2014 data are not final. Final submission deadline is January 31, 2016.

# 2015 Metrics

## Medicare

This slide shows 2014 and 2015 metrics under the 2014 model, which CMS will use for 2016 payments.

- 2015 performance is mixed
- More than 73% of the members have already been seen

### 2015 Metrics (2014 CMS Model)

Region	Access - % Mems w/RATS Enc		
	2014	2015	YOY
Colorado	70.9%	72.0%	1.1%
Georgia	77.9%	78.9%	1.0%
Hawaii	78.6%	77.1%	-1.5%
Mid-Atlantic	74.1%	68.9%	-5.2%
Northern California	71.0%	69.7%	-1.3%
Northwest	73.9%	74.4%	0.5%
Southern California	76.9%	76.0%	-1.0%
<b>MA Regions</b>	<b>73.9%</b>	<b>73.1%</b>	<b>-0.8%</b>

Prevalence - % Mems w/HCC		
2014	2015	YOY
40.3%	42.1%	1.8%
48.3%	52.6%	4.3%
44.9%	41.7%	-3.2%
42.6%	40.0%	-2.5%
49.2%	49.0%	-0.1%
45.6%	47.4%	1.8%
51.7%	51.9%	0.1%
<b>49.2%</b>	<b>49.4%</b>	<b>0.3%</b>

Complexity - HCCs/1000 Mems		
2014	2015	YOY
1,083	1,121	38
1,049	1,247	197
978	883	(95)
879	867	(13)
1,253	1,281	27
1,125	1,195	70
1,228	1,250	22
<b>1,212</b>	<b>1,240</b>	<b>28</b>

05-23-2015 RATS extract. Continuous members only.

# ACA Risk Score Summary – March 2015

- Existing Member year-to-date scores are higher than last month by 1.86 points program-wide.
  - Declines in some regions may be due to high proportions of 2015 existing members joining KP in 2014, a cohort who has shown to have lower scores than those who were members with KP before 2014.

ACA Risk Score Summary - March 2015 YTD					
Region	Risk Score				
	2015 YTD Existing	2014 YTD Existing	2015 vs. 2014 YOY	2015 YTD New	2015 YTD All Members
CO	0.7428	0.7585	(0.0157)	0.6789	0.7330
GA	0.9072	0.9259	(0.0187)	0.6472	0.8469
HI	0.7348	0.7683	(0.0335)	0.5504	0.7104
MA	0.7479	0.7534	(0.0055)	0.5643	0.6529
NCAL	0.7524	0.7268	0.0256	0.6199	0.7320
NW	0.9122	0.8473	0.0649	0.8265	0.9021
SCAL	0.7508	0.7327	0.0181	0.5797	0.7122
PW	0.7592	0.7406	0.0186	0.6003	0.7262

Risk scores are based on 5/11/2015 data extract.

Risk scores are based on silver metal plan coefficients.

Risk scores do not account for ACA enrollment impact (non-ACA dx capture, ACA mbr month weights)

# ACA Performance Metrics Summary – March 2015

- Members Seen has been updated to reflect only HHS eligible encounters based on the CPT filtering logic of the HHS Model.
- Members Seen (42.10%) and Members with HCC (11.62%) are both lower compared to Medicare, meaning fewer ACA members come in for a visit and fewer of those ACA members with a visit result in an HCC.

ACA Performance Metrics Summary - March 2015 YTD					
Region	Members Seen	Mbrs w HCC	Membership Volume		
	2015 YTD Members Seen	2015 YTD Members with an HCC	2015 YTD Total	Existing Member %	New Member %
CO	33.55%	8.46%	95,336	84.8%	15.2%
GA	42.46%	12.81%	30,126	76.8%	23.2%
HI	40.22%	7.77%	31,160	86.8%	13.2%
MA	37.93%	9.41%	107,707	48.3%	51.7%
NCAL	41.06%	12.59%	561,985	84.6%	15.4%
NW	43.28%	11.98%	38,577	88.2%	11.8%
SCAL	46.43%	11.77%	428,418	77.4%	22.6%
<b>PW</b>	<b>42.10%</b>	<b>11.62%</b>	<b>1,293,309</b>	<b>79.2%</b>	<b>20.8%</b>

**Note:**

- Metrics are based on 5/11/2015 data extract.

# RA Risk Score Summary (Medicare, ACA, CALPERS)

Through March/April

Summary of Key Risk Score Performance Metrics												
Region	Medicare Risk Score				ACA Risk Score				CalPERS Risk Score			
	2014 YTD Continuous	2015 YTD Continuous	2015 vs. 2014 YOY	2014 YE Continuous	2014 YTD Existing	2015 YTD Existing	2015 vs. 2014 YOY	2015 YTD All Members	2014 YTD Existing	2015 YTD Existing	2015 vs. 2014 YOY	2015 YTD All Members
	3/2014	3/2015	Change	12/2014	3/2014	3/2015	Change	3/2015	4/2014	4/2015	Change	4/2015
CO	0.7504	0.7743	0.0239	0.8342	0.7585	0.7428	(0.0157)	0.7330				
GA	0.7312	0.7911	0.0599	0.8465	0.9259	0.9072	(0.0187)	0.8469				
HI	0.7389	0.7183	(0.0206)	0.7632	0.7683	0.7348	(0.0335)	0.7104				
MA	0.6850	0.6888	0.0037	0.7297	0.7534	0.7479	(0.0055)	0.6529				
NCAL	0.8406	0.8581	0.0175	0.9112	0.7268	0.7524	0.0256	0.7320	0.9553	1.0191	0.0638	0.9976
NW	0.7860	0.8117	0.0257	0.8674	0.8473	0.9122	0.0649	0.9021				
SCAL	0.8232	0.8388	0.0156	0.8855	0.7327	0.7508	0.0181	0.7122	0.9394	0.9793	0.0399	0.9583
PW	0.8195	0.8361	0.0165	0.8871	0.7406	0.7592	0.0186	0.7262				
	Extract Date: 5/23/2015				Extract Date: 5/11/2015				Extract Date: 5/11/2015			

\*\*\* Risk Scores should not be compared between RA Programs. HHS Model used for ACA and CalPERS risk scores. CMS model used for Medicare risk scores. Models are different and yield different results\*\*\*

# Comparison of RATS to Encounter Data

## Comparison of RATS to Encounter Data

### Project Objective

- Compare RATS data with encounter data to identify data gaps on encounter level; research for root causes; and close encounter data submission gaps to achieve completeness of encounter data submission for payment neutrality.

### Increased Urgency – CMS has Initiated Migration to rely on EDS for Risk Adjustment Payment

- CMS will use 2014 diagnoses from both RAPS and EDS to calculate risk score for 2015 payment. Use of 2014 EDS will be reflected in the final risk score calculation, in July 2016. Encounter data is to be used together with RAPS and FFS data with no weight applied to any source.
- CMS will calculate risk score using 90% of risk scores based on RAPS and 10% risk scores based on EDS for payment year 2016 (2015 DOS)

## Comparison of RATS to Encounter Data

### Risk and Remediation –

- EDS submission gap could have relevant diagnoses linked to unique HCC resulting in loss revenue for payment year 2016.
- We have developed Supplemental Diagnosis Submission (SDS) to capture relevant diagnose accepted by CMS in RATS submission but no in EDS submission. However, SDS has its limitation –

Internal/External	Dx in EDS	Encounters in EDS	SDS Coverage
Internal	Missing	Found	Use EDS encounter information + Missing Dx
Internal	Missing	Missing	Use default value for encounter information + missing Dx
External	Missing	Found	Use EDS encounter information + Missing Dx
External	Missing	Missing	Out of Scope – Risk of loss revenue not covered by SDS

## Comparison of RATS to Encounter Data

### Challenges –

- RATS and EDS are two different submission flow from different sources. Matching the data, as well as root cause analysis is challenging.
  
- Discrepancies could be results of
  - Missing matching keys
  - True data gaps

### Current Status and Call for Action –

- Discrepancies have been identified
  
- Need collaboration between Regional teams (Rev Cycle and Claims) and Decision Support teams –
  - To perform root cause analysis on discrepancies – pull examples to research discrepancies to identify patterns; code and flag in the discrepant claim population; repeat the root cause analysis cycle to understand drivers for all discrepancies;
  - For identified root causes, to determine priority and collaborate for solutions to close the data submission gaps

# UPCOMING 2015 EVENTS

## RRG Events

- 07/21/2015 – RRG WebEx
- 08/18/2015 – RRG WebEx
- 09/15/2015 – RRG WebEx

## Other Events

- 6/30 – Final 2014 ACA Data Submission Report

# **EXHIBIT 11**

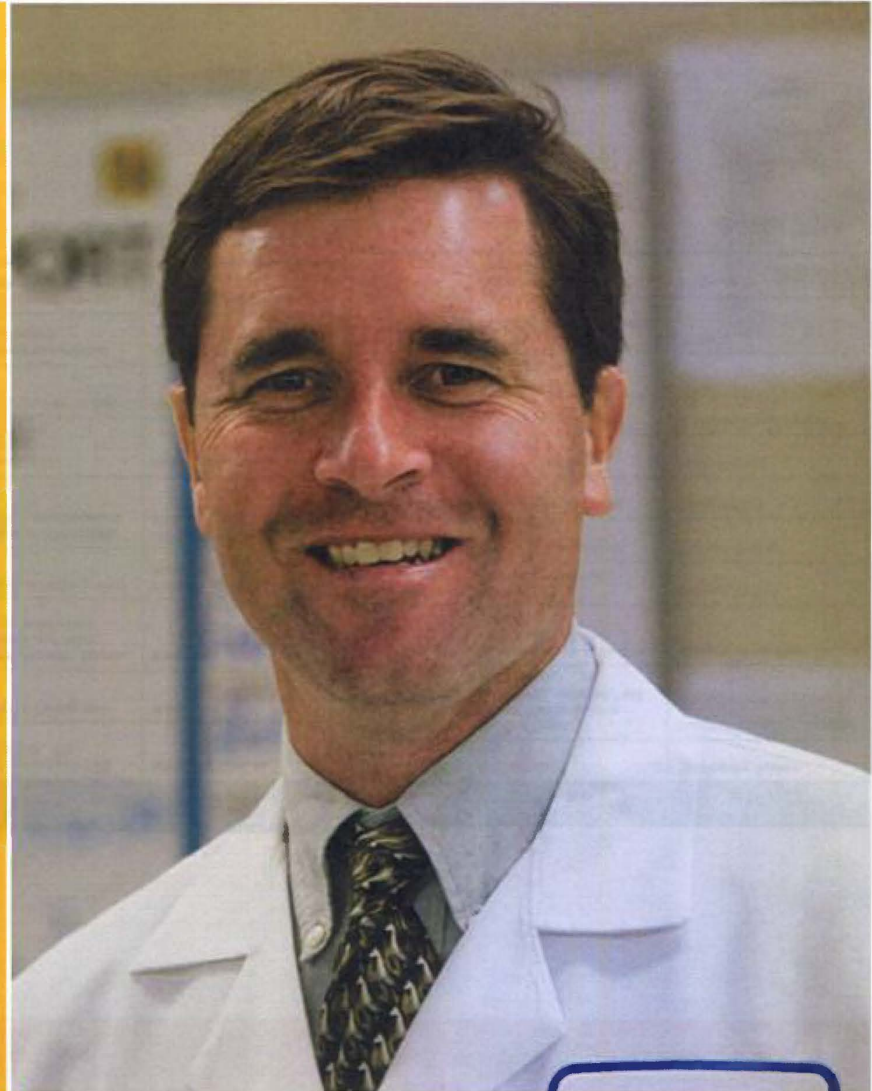
NORTHERN CALIFORNIA

# Clinical Documentation Integrity (CDI) Program: Update

Dexter D'Costa, MBBS, MHA, CRCC  
Regional Director, CDI

Helena Rush, RHIA, RHIT, CPC, CPC-H  
QA Manager, CDI

HIM Peer Group Meeting  
December 14, 2011



# CDI – Current Scope

## CURRENT SCOPE (Phase 1)

- Medicare Advantage population
- Specific Physician Groups
  - HBS (Hospital-based Specialists)
  - Intensivists (select facilities)
- 20 Hierarchical Condition Categories (HCC) diagnoses

	HCC	Condition	Body System / Disease Group
1	2	Sepsis (w/ pneumonia), SIRS, shock, UTI	Infectious Disease
2	7	Metastatic Cancer (all)	Neoplasm
3	10	Cancer: Prostate, Breast, Colorectal and other cancers and tumors	Neoplasm
4	15	Diabetes w / CKD or PVD	Endocrine / Nutrition & Metabolic
5	16	Diabetes w / Neuropathy and other manifestations	Endocrine / Nutrition & Metabolic
6	21	Protein Calorie Malnutrition (type/degree)	Nutrition & Metabolic
7	79	Respiratory Failure (all)	Respiratory System
8	105	PVD (with and without Complication)	Vascular System
9	131	Renal Failure/disease (include dialysis status)	Renal / Urinary system

	HCC	Condition	Body System / Disease Group
10	111, 112	Pneumonia *	Respiratory System
11	80, 81, 82, 83, 92	Cardiac (heart failure/shock, cardiac arrhythmia, acute MI,* old MI, angina)	Cardiac/Circulatory System
12	148, 149	Pressure ulcers (Cellulitis and all other chronic ulcers)	Disease of the Skin
13	75, 95, 96	Stroke* / CVA / Hemorrhage (coma)	Nervous System
14	100	Stroke* / CVA residual deficit	Nervous System
15	154, 155	Head Injuries (Trauma)	Trauma/Injury
16	157	Vertebral Fractures (Trauma)	Trauma/Injury
17	158	Hip Fractures (Trauma)	Musculoskeletal System
18	161	Traumatic Amputation (include status)	Injury
19	176	Artificial Opening feeding/Ostomies (status)	2 <sup>nd</sup> Dx
20	177	Amputation Status and Complications	2 <sup>nd</sup> Dx

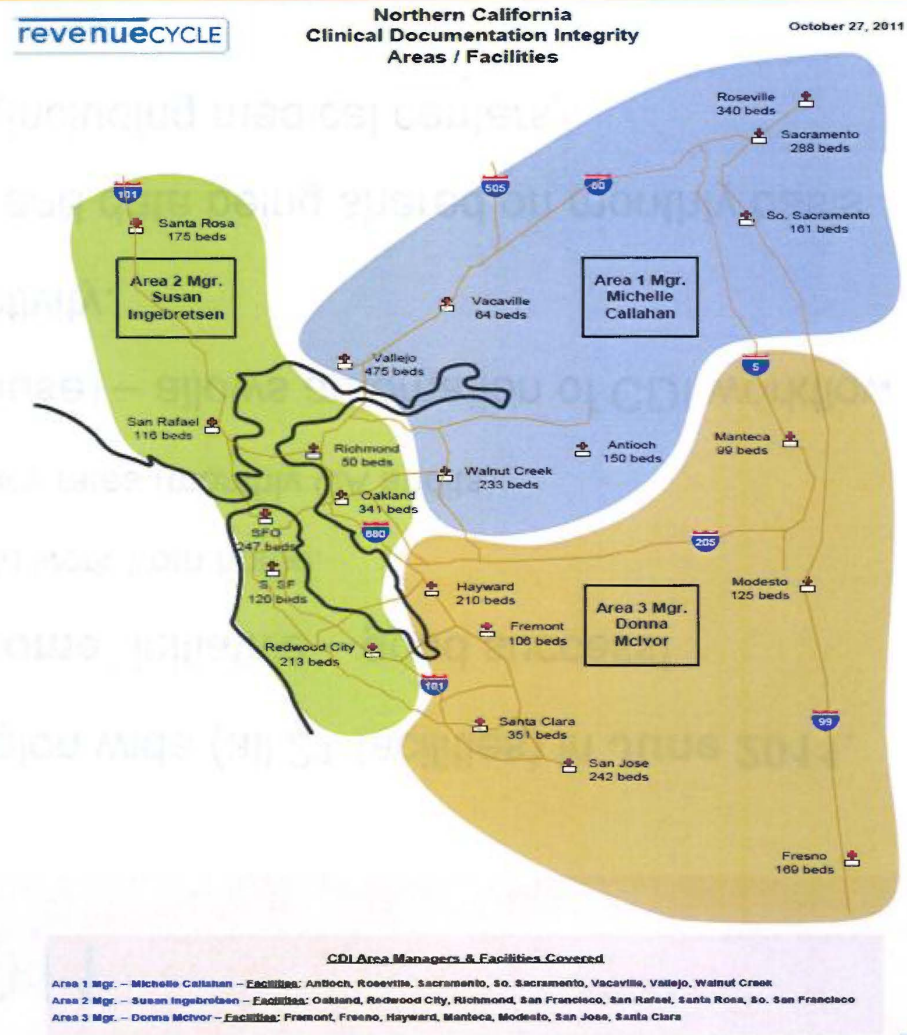
# NORTHERN CALIFORNIA

# CDI Roll-Out

2009 – 1 facility, 2010 – 5 facilities, 2011 – 15 facilities

### CDI Roll-Out: NCAL Region

- **South Sacramento: 12/2009**
- **South San Francisco: 10/04/2010**
- **Antioch: 11/29/2010**
- **Walnut Creek: 11/29/2010**
- **Roseville: 11/29/2010**
- **Sacramento: 11/29/2010**
- **Vallejo: 1/24/2011**
- **Vacaville: 1/24/2011**
- **Oakland: 2/14/2011**
- **Richmond: 2/14/2011**
- **San Francisco: 2/14/2011**
- **Redwood City: 2/14/2011**
- **Santa Rosa: 3/28/2011**
- **San Rafael: 4/11/2011**
- **Fremont: 4/25/2011**
- **Hayward: 4/25/2011**
- **San Jose: 5/9/2011**
- **Santa Clara: 5/9/2011**
- **Fresno: 6/6/2011**
- **Modesto: 6/6/2011**
- **Manteca: 6/6/2011**



# CDI Milestones: 2011

- CDI Roll-out completed region wide (all 21 facilities) in **June 2011**.
- CDI Nurses “**Work from Home**” initiative – good success!
  - 30 out of 35 CDI staff (85.7%) work from home.
  - High Review & Query accuracy rates (monthly QA audits).
- **CDI Tool** developed (in-house) – allows automation of CDI workflow and enhanced staff productivity.
- **CDI Dashboard** validated and data being shared on monthly basis with KP NCAL leadership (including medical centers).

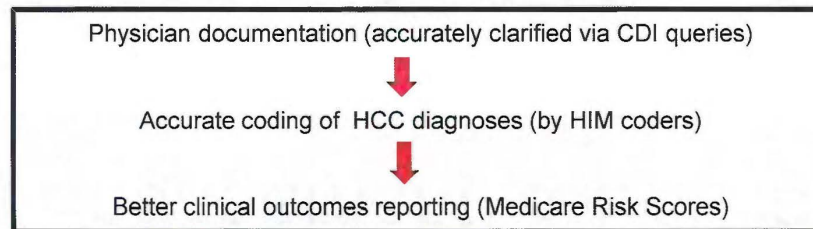
# CDI Workflow

## Medical Center CDI Leads

- **Physician Champion** – CDI medical leadership for the facility and regional CDI team
- **Regional CDI Manager** – Facility point of contact for all CDI operations

## CDI Staff

- **Clinical Documentation Integrity Senior Consultants (CDISC)**
  - Clinical background - RN
  - 1-2 per medical center – remotely located/census driven
  - Performs concurrent reviews in HealthConnect to identify gaps in physician documentation.
  - Work remotely from home with queries sent via **Dear Doctor Notes**
- **Clinical Documentation Integrity Consultants (CDIC)**
  - Inpatient coding background - CCS, RHIA, RHIT
  - Performs concurrent quality audits of CDISC work
  - Provides education to CDISC staff and ensures compliant queries



# Physician Engagement & Education

## PHYSICIAN ENGAGEMENT:

- **Monthly Phone Call with Physician Champion and CDI Leadership** to discuss data, develop plans for improvement, prepare for facility meeting.
- **Monthly In-Person HBS physician meetings** to share outcomes/receive feedback. CDI nurses attend HBS meetings.
- **Quarterly Physician Champion Meetings** (at Oakland) set up to facilitate sharing of “Best Practices”.

## PHYSICIAN FEEDBACK/EDUCATION:

- **CDI Query Escalation processes established at Medical Center**
  - ✓ Page - Phone Call - Weekly Reports (recently automated in CDI Tool)
- **CDI team working in collaboration with TPMG Physician Trainers**
  - ✓ EIO trainers invited to attend CDI HBS Meetings (and incorporate education sessions)
- **Physician-specific reports shared**
  - ✓ CDI sharing data with EIO data quality trainers on monthly basis.
  - ✓ Reports provide individual physician-specific data to identify improvement opportunities

# HIM (Health Information Management) Partnership

- **GOAL:** Ensure accurate capture of all HCC dx (based on CDI queries to physicians) reflected in coding.
  
- **FINDINGS:** Reasons for “CDI-HIM GAP”
  - **Manual (and time intensive) process** for CDI QA staff to validate dx in KP Health Connect
  - **Lack of data** to identify cases needing CDI-HIM reconciliation
  - **No established process/timelines** for escalating cases to CDI-HIM leadership
  
- **PROCESS IMPROVEMENT:**
  - **Automated coding validation** in CDI Tool – May 2011
  - **Coding reconciliation process** with CDI QA and Regional HIM for “Agreed But Not Coded Dx” – May-June 2011
  - **Query communication** (Account Note) process in KPHC between CDI RNs and HIM coders – August 2011
  
- **OUTCOME:** Reduced “Agreed but Not Coded” CDI-HIM Gap to **1 - 4 %**

NORTHERN CALIFORNIA

**CDI UPDATE: October 2011**

CDI Dashboard

Facility: 21 NCAL KP hospitals

Year: 2011

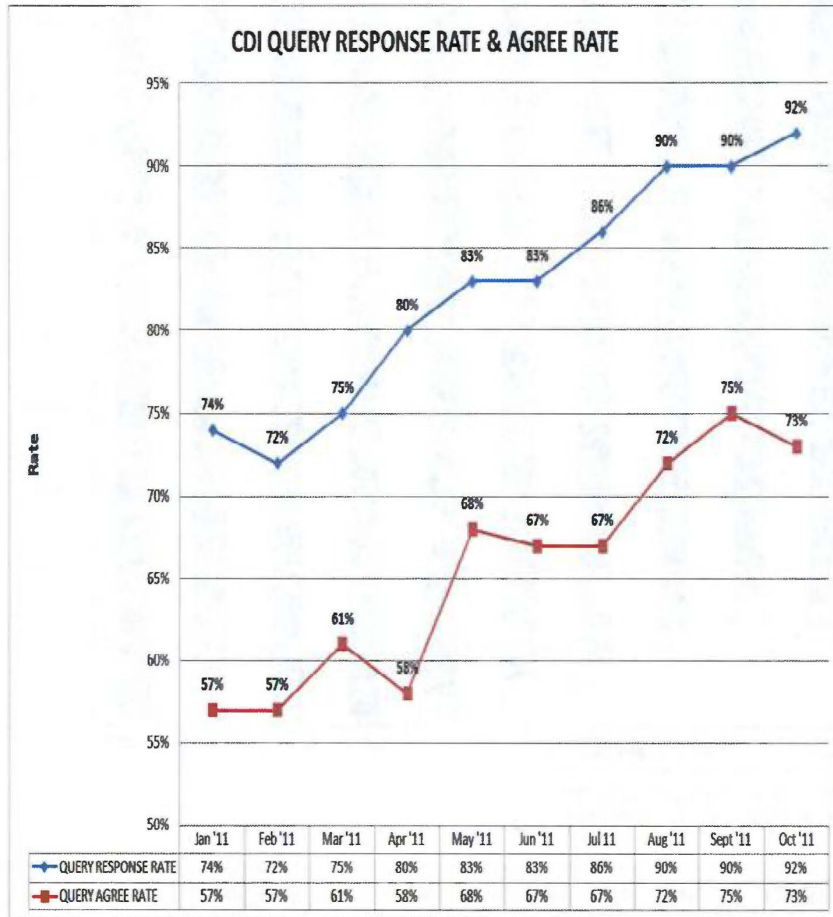
Metrics	Target	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	YTD
1 Overall Medicare Advantage CMI		1.58	1.61	1.58	1.69	1.67	1.67	1.65	1.69	1.67	1.72	1.65
2 Overall CDI Medicare Advantage CMI		1.55	1.57	1.64	1.64	1.63	1.64	1.63	1.67	1.65	1.7	1.63
3 # of Charts with Queries		667	608	768	854	849	1,010	978	975	968	1,250	8,927
	>30%	47%	38%	35%	36%	30%	32%	31%	30%	31%	38%	34%
4 # of Total Physician Queries		933	846	1,064	1,171	1,087	1,324	1,287	1,257	1,239	1,768	11,976
5 QUERY RESPONSE RATE		686	610	797	941	904	1,098	1,109	1,127	1,113	1,618	10,003
	>90%	74%	72%	75%	80%	83%	83%	86%	90%	90%	92%	84%
6 QUERY AGREE RATE		393	347	489	546	617	738	743	809	830	1,180	6,692
	>80%	57%	57%	61%	58%	68%	67%	67%	72%	75%	73%	67%
7 CODED BY HIM		379	345	481	543	609	724	729	798	810	1,098	6,516
	100%	96%	99%	98%	99%	99%	98%	98%	99%	98%	93%	97%
8 VALID HCCs		307	297	417	454	510	590	585	629	621	892	5,302
9 REVENUE IMPACT		\$1,659,006	\$1,554,105	\$2,175,995	\$2,436,074	\$2,769,664	\$3,166,611	\$3,071,676	\$3,363,463	\$3,297,033	\$4,314,520	\$27,808,145

Report Run Date: 11/22/2011

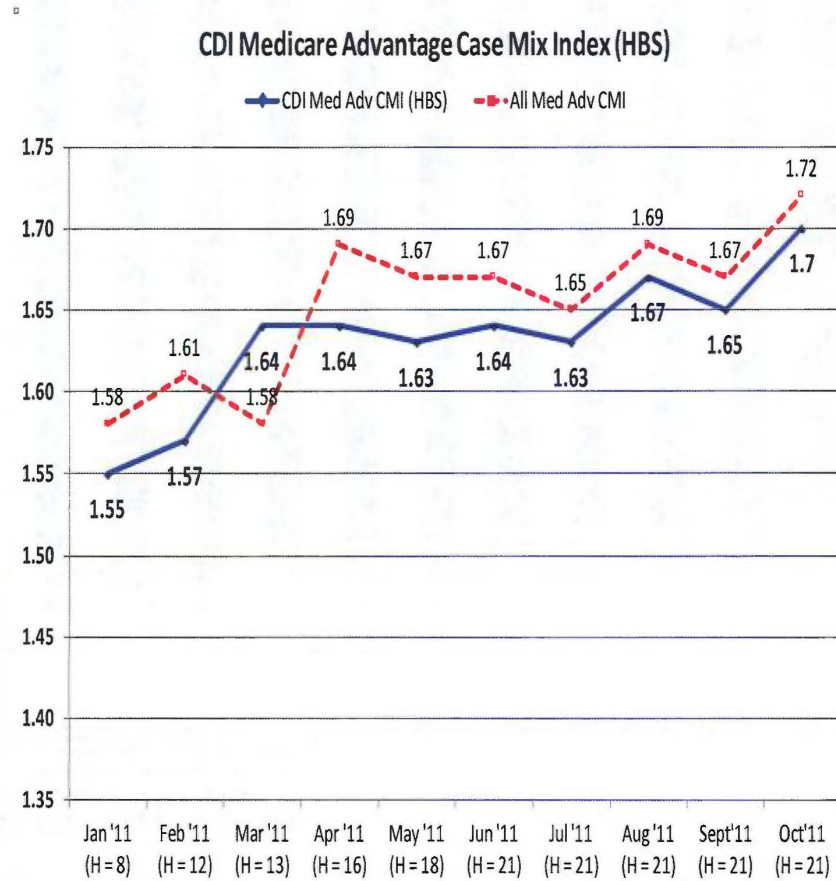
**KEY FINDINGS:**

- Query Response Rate (Oct 2011) = 92% → Last 3 months: Query Response Rate met 90% target for NCAL region.
- Query Agree Rate (Oct 2011) = 73%
- Revenue Impact (Oct 2011) = \$ 4.31 million
- YTD 2011 = \$ 27.80 million

# CDI Metrics 2011: Trends & Impact



Source: CDI Tool

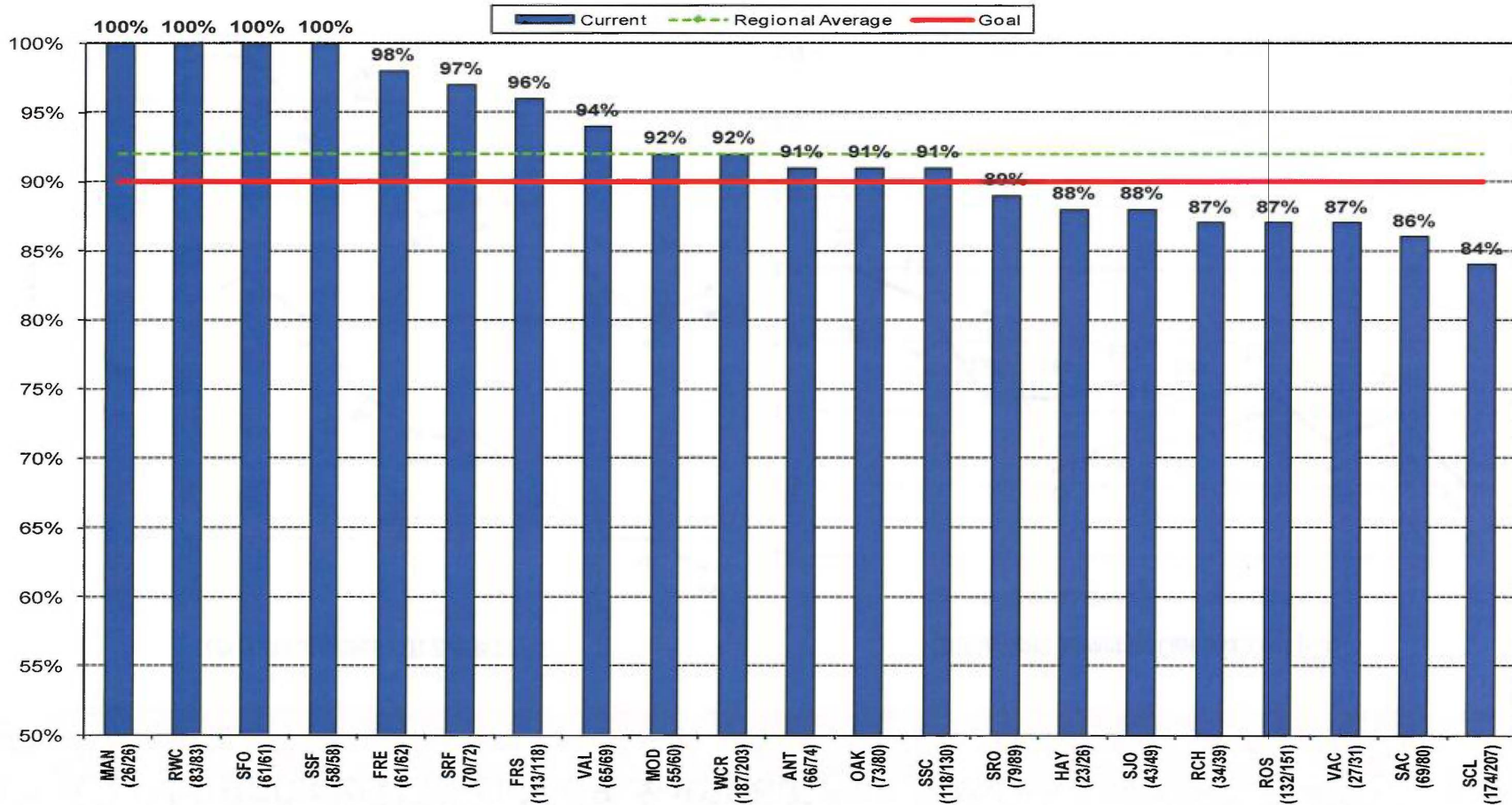


Source: Finance & Reporting

# Query Response Rate (Oct 2011):

→ 13 facilities (61.9%) are at or above 90% target. (Last Month - 12 facilities were at or above 90% target.)

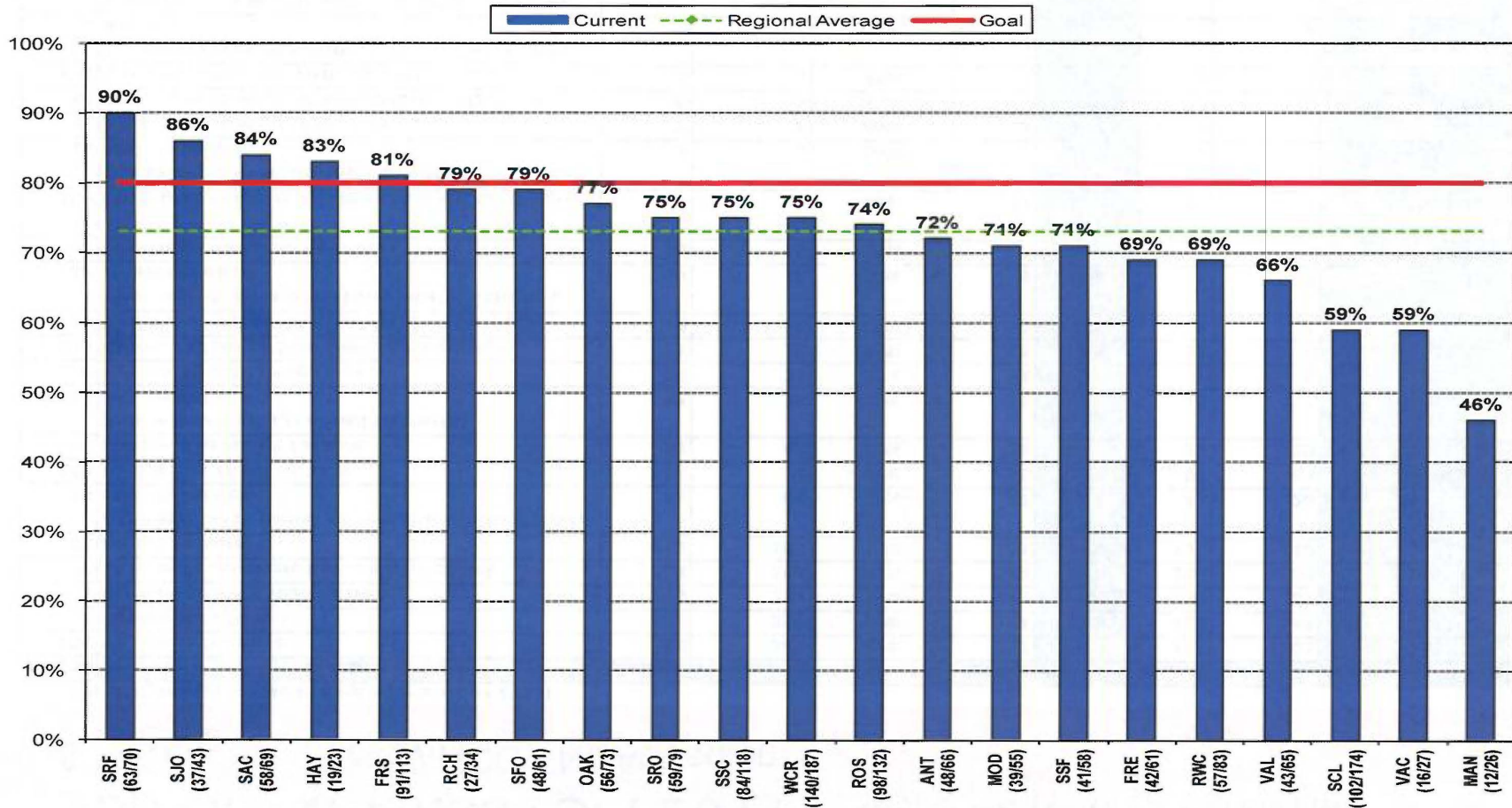
**CDI Query Response Rate by Facility**  
 October 2011 [Goal = 90%, NCAL Avg = 92%]



# Query Agree Rate (Oct 2011):

→ Agree Rate: 5 facilities (23.8%) are at or above 80% target. (Last Month – 7 facilities were at or above 80% target.)

**CDI Query Agree Rate by Facility**  
 October 2011: [Goal = 80%, NCAL Avg = 73%]



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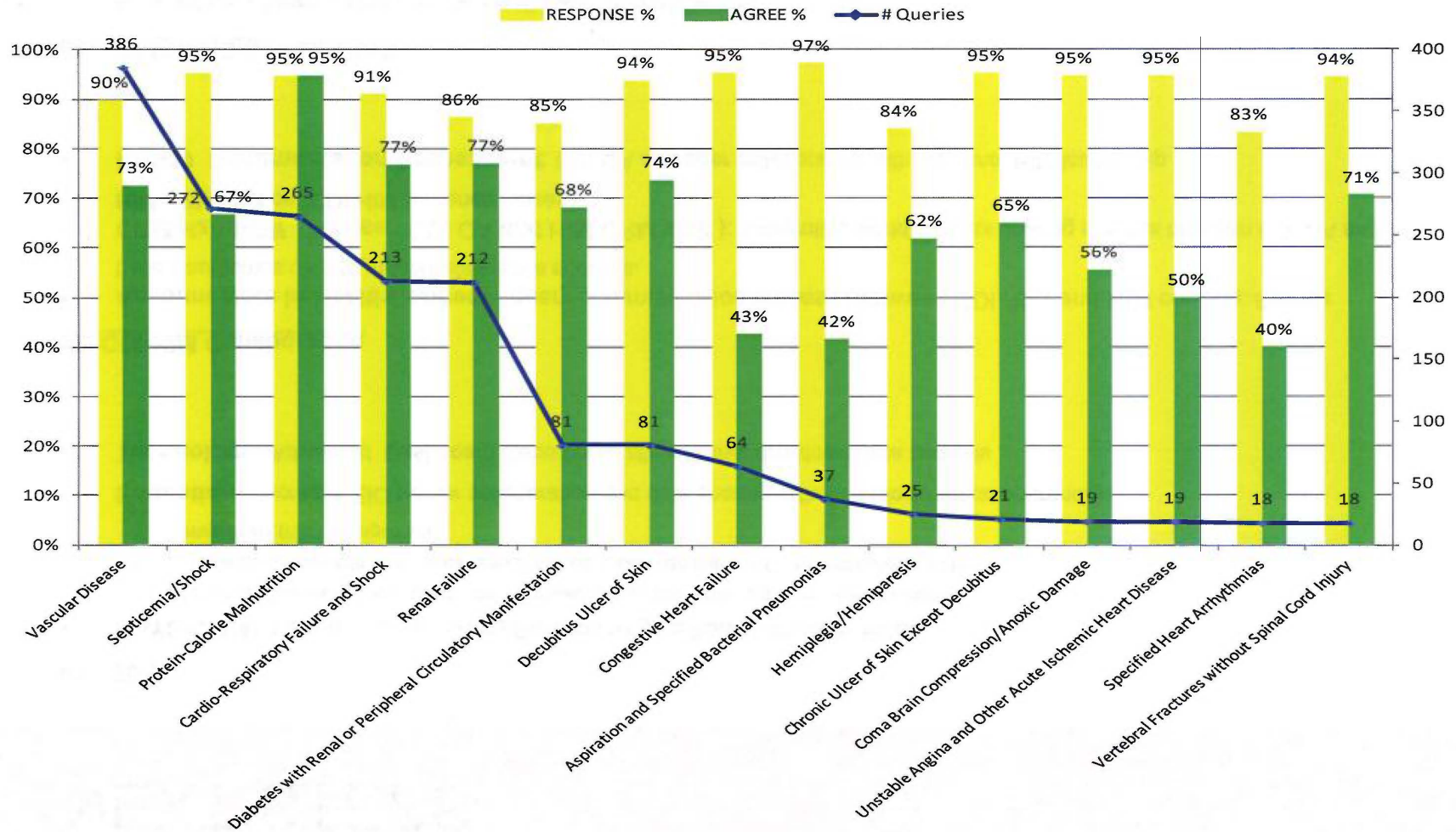
# Top CDI Queries (Oct 2011): Response Rate %, Agree Rate % & Revenue Impact by HCC - NCAL region

CDI HCC Analysis - NCAL Region (October 2011)

HCC Id	HCC Name	Queried	Responded	RESPONSE %	Agreed	AGREE %	Coded	Valid HCC	REVENUE IMPACT
105	Vascular Disease	386	347	90%	252	73%	225	201	\$516,258
2	Septicemia/Shock	272	259	95%	173	67%	167	143	\$882,188
21	Protein-Calorie Malnutrition	265	251	95%	238	95%	230	187	\$1,301,066
79	Cardio-Respiratory Failure and Shock	213	194	91%	149	77%	136	100	\$469,798
131	Renal Failure	212	183	86%	141	77%	131	110	\$329,021
15	Diabetes with Renal or Peripheral Circulatory Manifestation	81	69	85%	47	68%	43	26	\$107,355
148	Decubitus Ulcer of Skin	81	76	94%	56	74%	54	43	\$402,978
80	Congestive Heart Failure	64	61	95%	26	43%	25	20	\$66,650
111	Aspiration and Specified Bacterial Pneumonias	37	36	97%	15	42%	14	12	\$68,568
100	Hemiplegia/Hemiparesis	25	21	84%	13	62%	11	8	\$28,415
149	Chronic Ulcer of Skin Except Decubitus	21	20	95%	13	65%	12	6	\$21,897
75	Coma Brain Compression/Anoxic Damage	19	18	95%	10	56%	9	6	\$20,239
82	Unstable Angina and Other Acute Ischemic Heart Disease	19	18	95%	9	50%	7	7	\$16,158
92	Specified Heart Arrhythmias	18	15	83%	6	40%	5	3	\$7,144
157	Vertebral Fractures without Spinal Cord Injury	18	17	94%	12	71%	11	7	\$25,205
16	Diabetes with Neurologic or Other Specified Manifestation	9	8	89%	7	88%	7	3	\$9,949
81	Acute Myocardial Infarction	7	6	86%	2	33%	2	2	\$5,836
83	Angina Pectoris/Old Myocardial Infarction	5	5	100%	2	40%	2	2	\$3,966
104	Vascular Disease with Complications	4	3	75%	3	100%	2	1	\$4,958
112	Pneumococcal Pneumonia Emphysema Lung Abscess	3	3	100%	3	100%	2	2	\$4,048
10	Breast Prostate Colorectal and Other Cancers and Tumors	3	3	100%	1	33%	1	1	\$1,691
158	Hip Fracture/Dislocation	2	1	50%	0	0%	0	0	\$0
7	Metastatic Cancer and Acute Leukemia	2	2	100%	1	50%	1	1	\$18,499
176	Artificial Openings for Feeding or Elimination	1	1	100%	0	0%	0	0	\$0
95	Cerebral Hemorrhage	1	1	100%	1	100%	1	1	\$2,633
	<b>Total:</b>	<b>1,768</b>	<b>1,618</b>	<b>92%</b>	<b>1,180</b>	<b>73%</b>	<b>1,098</b>	<b>892</b>	<b>\$4,314,520</b>

NORTHERN CALIFORNIA

# Top 15 CDI Queries (Oct 2011): Response Rate %, Agree Rate % by HCC - NCAL region



# NEXT STEPS:

## #1. CDI:

- **PHYSICIAN:** Perform detailed Query Response/Agree Rate analysis by HCCs.
  - Focus on Queries with low “query rate” (if missed query opportunity) e.g. Aortic Atherosclerosis
  - Focus on Queries with “low” agree rates (if MD education needed) e.g. Coma, Hemiplegia, CHF
  - Intensivists (ICU) engagement
- **Education:** Increase EIO trainer collaboration and data sharing with CDI (documentation trends).
- **Technology:** Advanced Dashboard Reporting – allow further drill-down/data analysis

## #2. CDI-HIM Collaboration

- **Account Note in HealthConnect** - query communication process (between CDI RNs and HIM coders): Provide trends/outcomes data to measure/evaluate success.
- **CRM Hand-Off** (between CDI QA and HIM CRM staff ): Streamline workflow/data sharing process between CDI QA and HIM CRM staff on “CDI-HIM Variance” cases.
- **ICD-10 Documentation Assessment:** CDI QA manager collaborating with Regional HIM leadership.

## #3. CDI PHASE 2: Year 2012

- **New HCCs** - Morbid Obesity, Dementia with complications
- ★ **Additional Physician Specialties** - General Surgery [work in progress!!!]
- **Linkage to Quality and HIM initiatives** – Hospital-Acquired Conditions (HACs), Present-on-Admission (POA)



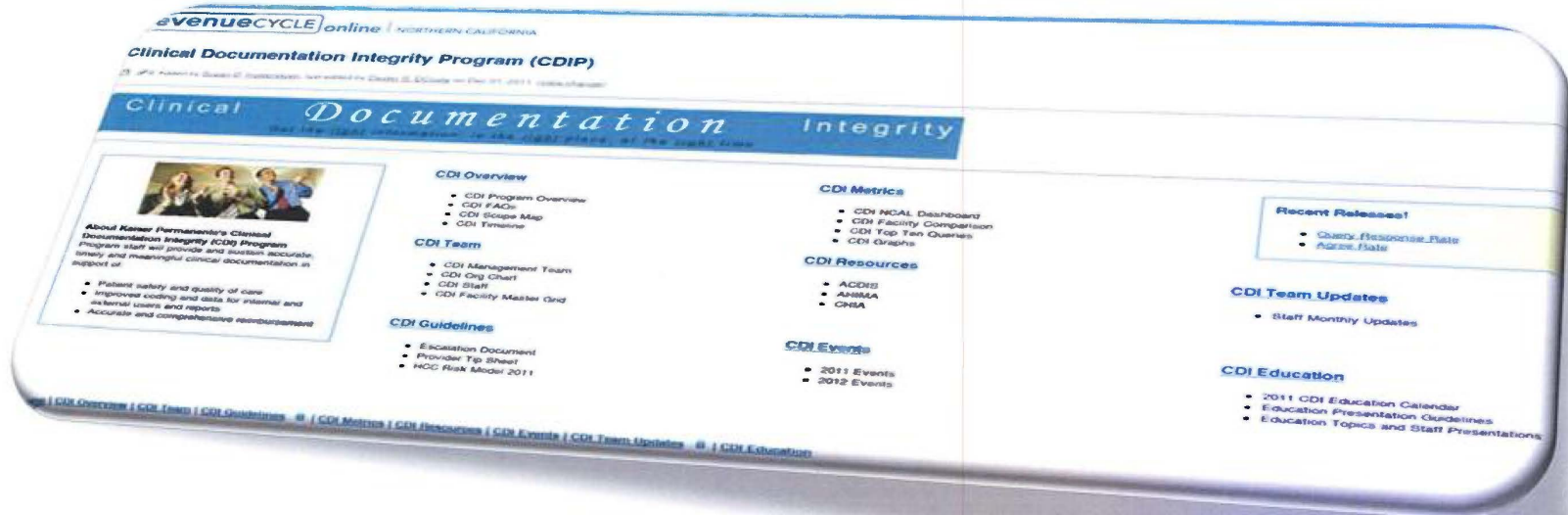
# QUESTIONS



- **Dexter D'Costa MBBS, MHA, CRCR**  
Regional Director, CDI  
Office: 510-625-5350  
Cell: 510-301-0323  
Email: [Dexter.G.Dcosta@kp.org](mailto:Dexter.G.Dcosta@kp.org)

- **Helena Rush, RHIA, RHIT, CPC, CPC-H**  
AHIMA Certified ICD-10-CM-PCS Trainer  
Regional QA Manager, CDI  
Office: (510) 625-5652  
Cell: (510) 381-7633  
Email: [Helena.C.Rush@kp.org](mailto:Helena.C.Rush@kp.org)

Visit us at CDI Wiki: <https://wiki.kp.org/wiki/x/uQRqCQ>



# **EXHIBIT 12**



**Request for Coding Advice**

Please formulate and submit your specific question regarding ICD-9-CM coding. Only one question may be submitted per request. Include pertinent documentation along with your request that will assist the Central Office in determining the appropriate diagnosis and/or procedure code assignment(s). The health record

Documentation may include copies of the discharge summary, history and physical examination, consultation report, progress notes and operative and pathology reports (if applicable). Other relevant information such as nursing or physician notes should be presented in a typed format. Questions submitted without the supporting health record documentation may be returned unanswered.

In accordance with HIPAA requirements, remove all identifying information (i.e., hospital name, patient name, birth date, social security number and provider identifiers) from copies of the medical record documentation. Any request not complying with HIPAA will be returned unanswered.

Complete the form below and mail it along with your supporting documents to:

Central Office on ICD-9-CM  
Coding Advice  
American Hospital Association  
155 North Wacker Drive, Suite 400  
Chicago, IL 60606

You may also fax the question and documentation to: 312/278-0838 or 312/422-4583

**Request for Coding Advice**

Date: 12/30/2012  
Name: Gloryanne Bryant  
Department: Regional HIM  
Facility: Kaiser Permanente Rev Cycle  
HIM  
Address: 1800 Harrison St., #24  
City: Oakland State: CA Zip Code: 94612  
Phone Number 510 625 3980 Email Address  
gloryanne.h.bryant@kp.org

**Question:**

**Many physicians believe that the diagnosis/condition of Aortic Atherosclerosis is a Chronic Systemic Condition. We had our physicians provide education about this condition and this included risk factors with AA:**

- Dyslipidemia (high LDL, low HDL): high cholesterol
- Diabetes  Smoking  Obesity
- Metabolic Syndrome (abdominal obesity, along with at least 2 of the following: dyslipidemia, hypertension, insulin resistance)

- Hyperinsulinemia
- Hypertension
- Systemic infections
- Sedentary lifestyle
- Prothrombotic states
- Renal insufficiency
- Age
- Family history

**Thus, like COPD or Diabetes Mellitus, CAD, Lupus, should we code Aortic Atherosclerosis condition when documented, either outpatient or inpatient record similar to COPD? Thank you.**

# **EXHIBIT 13**

AA



**Coding Clinic question re Aortic Atherosclerosis**

Janet D Franklin to: Nancy J Andersen, Diana Medal, Gloryanne  
H Bryant, Joan M Guilford

08/25/2014 02:17 PM

Default custom expiration date: 08/25/2015

Attached is a draft copy of the letter to Coding Clinic for you to submit for further review to Simon and other stakeholders (Anne V Cadwell, Steven Olson, Treska T Francis, James M Taylor)



Aortic Atherosclerosis Packet for Coding Clinic, Draft 1.pdf

Thanks,

Janet (don't forget the) D Franklin

Janet D Franklin, RHIT, CCS, CCS-P, CHC  
AHIMA Approved ICD-10-CM/PCS Trainer  
Compliance Manager, Government Audit and Reimbursement  
National Compliance, Ethics & Integrity Office  
Office: 8-423-5735, 510-271-5735  
Fax: 8-423-5039, 510-891-5039

Admin Assistant: Elizabeth Styles  
8-423-6831, 510-271-6831

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Central Office on ICD-10-CM  
American Hospital Association

Request for Coding Advice

Question: We would like to ask Coding Clinic for clarification as to whether a diagnosis of aortic atherosclerosis would be considered a systemic condition that can be coded even in the absence of active intervention in the same way that other systemic diagnoses noted in Coding Clinic (e.g. COPD, CHF, Diabetes, Parkinson's Disease, hypertension) may be coded without additional documentation of evaluation, treatment, consideration; etc.

This issue has come to light primarily in review of the documentation and coding of physician office encounters

An earlier request for coding advice was made regarding the status of this diagnosis as a systemic condition and the response from Coding Clinic was that if the impact were unclear, the physician should be queried. Please see attached response Ref#50001447.213

Some interpreted this advice to mean that aortic atherosclerosis would not be considered a systemic condition, because if it were, it would not be necessary to query the physician. Others felt that this meant if the physician considered the condition to be systemic; it could be coded with just listing the condition as one of the patient's conditions with no documentation as to impact of the condition on the encounter. For instance, a patient may come in to see a provider to have a dog bite treated. All physician documentation is related to the dog bite. No mention of aortic atherosclerosis is made anywhere in the encounter note, yet the physician assigns it as a visit diagnoses which in our electronic record results in the code being submitted for the encounter, or it may be listed in the problem list and brought down as a visit diagnosis, again without any further documentation elsewhere in the note, similar to the capture of COPD.

Another example may be where the physician copies and pastes in a previous radiology report which notes minimal aortic atherosclerosis as one of several observations. It may be a recent report or an older report. Again, no other mention of the condition is made but the diagnosis is captured as an encounter diagnosis and the code reported.

Related to this question is the clarification of the documentation required to support the coding of the diagnosis of aortic atherosclerosis if, in fact, it is not considered a systemic condition. Some providers feel that the fact that the patient's hypertension was evaluated supported assigning a visit diagnosis of aortic atherosclerosis resulting in the submission of the related code. In some cases the aortic atherosclerosis is listed in the problem list, and the provider, while not mentioning the aortic atherosclerosis, does document information related to the patient's hypercholesterolemia and/or hyperlipidemia and the treatment for those conditions and considers this to be sufficient documentation to assign a visit diagnosis of aortic atherosclerosis resulting in submission of the related code.

We have two examples attached for your consideration. We would appreciate your review and opinion. As this is an issue where providers are generating the encounter note and documenting the visit

diagnosis which results in a code being submitted, this is not a query issue, but one of education for both our providers and coding auditors.

Thank you,

Janet Franklin, RHIT, CCS, CCS-P, CHC  
Compliance Manager  
National Compliance, Ethics & Integrity Office  
Kaiser Permanente

# Previous Coding Clinic Response

Ref #50001447.213

Central Office on  
**ICD-9-CM**

American Hospital Association  
155 N. Wacker Drive, Suite 400  
Chicago, IL 60606-1725  
312-422-3366  
312-278-0838

May 16, 2013

Gloryanne Bryant  
Regional HIM  
Kaiser Permanente  
1800 Harrison St., #24  
Oakland, CA 94612

Dear Ms. Bryant,

This letter is in response to your request for clarification if it is appropriate to report aortic atherosclerosis as a chronic systemic condition.

When a patient has a chronic systemic condition that affects the patient the rest of his/her life, it is appropriate to assign a code for that condition.

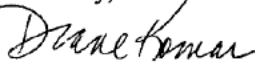
As stated in *Coding Clinic* 3<sup>rd</sup> Quarter, 2007, Pages 13-14; "Chronic conditions such as, but not limited to, hypertension, Parkinson's disease, COPD, and diabetes mellitus are chronic systemic diseases that ordinarily should be coded even in the absence of documented intervention or further evaluation. Some chronic conditions affect the patient for the rest of his or her life and almost always require some form of continuous clinical evaluation or monitoring during hospitalization, and therefore should be coded." This advice applies to inpatient coding.

For outpatient encounters/visits, chronic conditions that require or affect patient care treatment or management should be coded. The Official Guidelines for Coding and Reporting for Outpatient Services, state, "Chronic diseases treated on an ongoing basis may be coded and reported as many times as the patient receives treatment and care for the conditions(s). Code all documented conditions that coexist at the time of the encounter/visit and require or affect patient care treatment or management. Do not code conditions that were previously treated and no longer exist. Conversely, conditions that do not require or affect patient care, treatment or management are not reported."

If the coder is unclear whether a specific condition meets the definition of a chronic or secondary diagnosis, it is appropriate to query the provider for clarification. Please see *Coding Clinic*, Second Quarter 2000 Pages: 20-21.

I trust this information will be of assistance to you.

Sincerely,



Diane Komar, RHIT  
Coding Consultant  
Ref. #50001447.213

AHA CENTRAL OFFICE

An American Hospital Association Service



This coding information is being provided specifically to you based on the facts and details you provided. The American Hospital Association has used its best efforts to provide accurate coding advice, but this advice should not be construed as providing clinical advice, dictating reimbursement policy, or a substitution for the judgment of a practitioner. This information is provided for individual reference only. Any reprint or distribution of all or part of this correspondence, without the express written consent of the American Hospital Association's Central Office on ICD-9-CM, is strictly prohibited.

VH00080

REL0000189

## Example Case 1

**Office Visit**

1/9/2013 Office Visit

Patient Name

| MRN:

**Visit and Patient Information**

**Encounter Information**

Date & Time	Provider	Department	Encounter #	Center
1/9/2013	XXX, MD	REDACTED		REDACTED

**Encounter**

Closed by XXX, MD on 1/9/13 at 6:19 PM

**Diagnoses**

TROCHANTERIC BURSTITIS - Primary	726.5
ATHEROSCLEROSIS AORTA	440.0

There are no scans attached to this encounter.

**Future Appointments**

[View Future Appointments](#)

**After Visit Summary**

[After Visit Summary](#)

**Patient History**

**Patient History**

[History as of Encounter Date](#)

**Orders and Medications**

**Medication Administration Report for Patient Name**

All administrations

No administration data available

**Medications Reviewed**

User	Date and Time
Name, RN [Z320811] Meds	2/6/2014

**Comments as of 2/21/2005**

took no pills today

**Visit Summary**

**Default Flowsheet Data (all recorded)**

**Encounter Vitals**

	01/09/13
	1425
<b>Enc Vitals</b>	
BP	114/66 mmHg
	-JS
Pulse	88
	-JS
Resp	18
	-JS
Temp	97.6 °F (36.4 °C)
	-JS
Temp src	Tympanic
	-JS
SpO2	95 %
	-JS

(r) = User Recd, (t) = User Taken, (c) = User Cosigned

User Key		Effective Dates
Initials	Name	

**Default Flowsheet Data (all recorded)**

Additional Vitals	
	01/09/13 1425
<b>Cuff Size/Location</b>	
Cuff Size	
BP Location	
<b>Respiratory Vitals</b>	
Activity	
SpO2	95 % -JS
O2 Method	
Pulse	88 -JS
Resp	18 -JS
Peak Flow	
Quality of Peak Flow	
<b>Orthostatic Vitals</b>	
Lying Heart Rate	
Lying BP	
Sitting Heart Rate	
Sitting BP	
Standing Heart Rate	
Standing BP	
<b>Four Limb BP</b>	
Four Limb Blood Pressure?	

(r) = User Recd, (t) = User Taken, (c) = User Cosigned

User Key		Effective Dates
Initials	Name	

**All Flowsheet Templates (all recorded)**

Encounter Vitals Flowsheet

**Progress Notes**

XXX, MD at 1/21/2013 8:29 AM  
Status: Signed

Atherosclerosis of the aorta is added to diagnoses- 7/19/06 ct abd - "Minimal atherosclerotic calcification is shown in the aorta, but there is no aneurysm,dissection or rupture."

Electronically signed by XXX, MD at 1/21/2013 8:29 AM

XXX, MD at 1/9/2013 6:19 PM

Status: Signed

Pt presents with c/o knee and hip pain. He will have increased pain with prolonged standing or walking. He will increased pain at night which makes it more difficult to sleep. He has not had any distinct injury to the leg. Pain has now been present for the past 1 1/2 weeks. He has been using heat and some menthol topically. He has taken some pain pills that he had left over but these were not particularly helpful.

He states he used oxycodone from an old prescription.

He states he stopped all of his diabetes medications for several months, is now just taking cinnamon and some other over the counter supplements. He feels his blood sugar have been adequately controlled without medications- he has not taken these for months, he is not sure exactly when he stopped these. He has had home blood sugars < 150 consistently - he states 110 yesterday, 131 this morning when he checked.

OBJECTIVE: NAD. Vitals as above.

LLE- hip ROM is normal and he does not have significant discomfort with int/ext rotation or axial loading of the hip. He is tender to palpation around the greater trochanter and this is area of concern- palpation does reproduce his symptoms. He has some tenderness extending to the ITB as well, no tenderness around the L knee and no knee erythema/swelling.

ASSESSMENT: See dx.

PLAN:

1. Trochanteric bursitis handout is provided. We discussed cross-stretching, hamstring stretching, piriformis stretching. Ice to greater trochanter- avoid heat. Consider cortisone injection if symptoms are not improving.
2. As above, he has d/c his diabetes medications against my advice. He does not at this point want to restart these medications. He has had blood work drawn this morning and further consideration will be made after test results are available.

Electronically signed by XXX, MD at 1/9/2013 6:19 PM

#### Transcription

Transcription

#### Reason for Visit

**LEG PROBLEM**

#### Patient Instructions

Use **ice, not heat**, on the area of discomfort on your leg.

Anti-inflammatories like advil, aleve, and high dose aspirin should be avoiding as they can elevate the blood pressure, damage the kidneys, and cause stomach irritation/ulcers. **Tylenol is a safe choice for pain relief.**

You can take tylenol up to 1000mg 3 times per day for pain. The maximum dose of tylenol is 3000mg per 24 hours.

#### **Trochanteric Bursitis: Exercises**

#### **Your Care Instructions**

Here are some examples of typical rehabilitation exercises for your condition. Start each exercise slowly.

Ease off the exercise if you start to have pain.

Your doctor or physical therapist will tell you when you can start these exercises and which ones will work best for you.

#### **How to do the exercises**

##### **Hamstring wall stretch**

1. Lie on your back in a doorway, with your good leg through the open door.
2. Slide your affected leg up the wall to straighten your knee. You should feel a gentle stretch down the back of your leg.
  - Do not arch your back.
  - Do not bend either knee.
  - Keep one heel touching the floor and the other heel touching the wall. Do not point your toes.
1. Hold the stretch for at least 1 minute to begin. Then try to lengthen the time you hold the stretch to as long as 6 minutes.
2. Repeat 2 to 4 times.

If you do not have a place to do this exercise in a doorway, there is another way to do it:

1. Lie on your back, and bend the knee of your affected leg.
2. Loop a towel under the ball and toes of that foot, and hold the ends of the towel in your hands.
3. Straighten your knee, and slowly pull back on the towel. You should feel a gentle stretch down the back of your leg.
4. Hold the stretch for 15 to 30 seconds. Or even better, hold the stretch for 1 minute if you can.
5. Repeat 2 to 4 times.

##### **Straight-leg raises to the outside**

1. Lie on your side, with your affected leg on top.
2. Tighten the front thigh muscles of your top leg to keep your knee straight.
3. Keep your hip and your leg straight in line with the rest of your body, and keep your knee pointing forward. Do not drop your hip back.
4. Lift your top leg straight up toward the ceiling, about 12 inches off the floor. Hold for about 6 seconds, then slowly lower your leg.
5. Repeat 8 to 12 times.

##### **Clamshell**

1. Lie on your side, with your affected leg on top and your head propped on a pillow. Keep your feet and knees together and your knees bent.
2. Raise your top knee, but keep your feet together. Do not let your hips roll back. Your legs should open up like a clamshell.
3. Hold for 6 seconds.
4. Slowly lower your knee back down. Rest for 10 seconds.
5. Repeat 8 to 12 times.

##### **Standing quadriceps stretch**

1. If you are not steady on your feet, hold on to a chair, counter, or wall. You can also lie on your stomach or your side to do this exercise.
2. Bend the knee of the leg you want to stretch, and reach behind you to grab the front of your foot or ankle with the hand on the same side. For example, if you are stretching your right leg, use your right hand.
3. Keeping your knees next to each other, pull your foot toward your buttock until you feel a gentle stretch across the front of your hip and down the front of your thigh. Your knee should be pointed directly to the ground, and not out to the side.
4. Hold the stretch for 15 to 30 seconds.
5. Repeat 2 to 4 times.

##### **Piriformis stretch**

1. Lie on your back with your legs straight.

2. Lift your affected leg and bend your knee. With your opposite hand, reach across your body, and then gently pull your knee toward your opposite shoulder.
3. Hold the stretch for 15 to 30 seconds.
4. Repeat 2 to 4 times.

**Double knee-to-chest**

1. Lie on your back with your knees bent and your feet flat on the floor. You can put a small pillow under your head and neck if it is more comfortable.
2. Bring both knees to your chest.
3. Keep your lower back pressed to the floor. Hold for 15 to 30 seconds.
4. Relax, and lower your knees to the starting position.
5. Repeat 2 to 4 times.

**Follow-up care is a key part of your treatment and safety.** Be sure to make and go to all appointments, and call your doctor if you are having problems. It's also a good idea to know your test results and keep a list of the medicines you take.

**Where can you learn more?**

Go to <http://www.kp.org>

Enter **N503** in the search box to learn more about "**Trochanteric Bursitis: Exercises.**"

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Content Version: 9.4.94723; Last Revised: January 26, 2012

**Level of Service**

OUTPT EST LEVEL 3 [99213B]

**Allergies**

Reviewed On: 12/3/2012 By:

**Allergies as of 1/9/2013**

Allergen	Noted	Type	Reactions
Lisinopril Cough	10/03/2008	Intolerance	Other
No Latex Allergy	01/26/2005		
Smoke bronchial spasma	02/21/2005		

**Current Medications**

Current Medications Report (as of 01/09/13)

**User Access Log****Opened By**

User Name (Lpn) User	Instant 01/09/13 1425	Changed From Appointment	Changed To Office Visit

**Access Log**

User Access Log for Encounter

**Appointment Information****Previous Visit**

12/3/2012 9:20 AM

Department  
REDACTED

Encounter #  
REDACTED

**Electronically Signed: Charting**

---

Date and Time	Name
Wed Jan 9, 2013 6:19 PM	XXX, MD

**KPCO DIVERSITY QUESTIONNAIRE**

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Question	Answer
INTERPRETER?	No [2]
LANG SPOKEN	English [22]
LANG WRITTEN	English [20]
ETHNICITY	Unknown [9]
RACE	Unknown - Patient Refusal or Acknowledgment of Race [64]

**BILLING QUERY**

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[Create In Basket Message](#)

**MEDICARE QUERY**

---

[Create In Basket Message](#)

## Encounter Medications as of 1/9/2013

## Outpatient Medications

	Quantity	Refills	Start	End
<b>LEVOTHYROXINE 50 MCG ORAL TAB (Discontinued)</b> Sig : TAKE ONE TABLET ORALLY ONCE DAILY FOR THYROID REPLACEMENT Route: Oral Reason for Discontinue: Continue Therapy	90	0/2	12/10/2012	7/31/2013
<b>HYDROCHLOROTHIAZIDE 25 MG ORAL TAB (Discontinued)</b> Sig : TAKE ONE TABLET ORALLY EVERY DAY FOR BLOOD PRESSURE (DUE FOR APPT BY 1/2013!!!) Route: (none) Reason for Discontinue: Other Reason	90	1/1	9/14/2012	7/31/2013
<b>SIMVASTATIN 40 MG ORAL TAB</b> Sig : TAKE ONE TABLET ORALLY EVERY DAY FOR CHOLESTEROL Route: (none)	90	PRN	2/8/2012	2/7/2013
<b>ONE TOUCH ULTRA TEST MISC STRIPS</b> Sig : USE AS DIRECTED Route: Miscell. (Med.Supl.;Non-Drugs)	100	PRN	2/7/2012	2/6/2013
<b>OMEPRAZOLE 20 MG ORAL CPDR SR CAP</b> Sig : TAKE ONE CAPSULE ORALLY ONE TO TWO TIMES A DAY FOR ACID REFLUX Route: (none)	180	PRN	1/31/2012	1/30/2013
<b>ONE TOUCH DELICA LANCETS MISC MISC</b> Sig : USE AS DIRECTED FOR DIABETES Route: Miscell. (Med.Supl.;Non-Drugs)	100	PRN	1/31/2012	1/30/2013
<b>TERAZOSIN 1 MG ORAL CAP (Discontinued)</b> Sig : TAKE TWO CAPSULES ORALLY AT BEDTIME FOR BENIGN PROSTATIC HYPERTROPHY Route: (none) Reason for Discontinue: Continue Therapy	180	PRN	1/31/2012	1/30/2013
<b>GLIPIZIDE 10 MG ORAL TAB (Discontinued)</b> Sig : TAKE ONE-HALF TABLET ORALLY TWICE DAILY FOR DIABETES Route: Oral Reason for Discontinue: Discontinue Prescription	30	PRN	1/31/2012	1/15/2013
<b>LOSARTAN 25 MG ORAL TAB (Discontinued)</b> Sig : TAKE ONE TABLET ORALLY EVERY DAY FOR BLOOD PRESSURE AND KIDNEY PROTECTION Route: (none) Reason for Discontinue: Replaced by Pharmacy	90	PRN	1/31/2012	1/30/2013
<b>METFORMIN 1000 MG ORAL TAB (Discontinued)</b> Sig : TAKE ONE TABLET ORALLY TWICE DAILY FOR DIABETES Route: Oral Comment: Pharmacy- please make sure patient is aware that tablets have changed from 500 to 1000mg tabs. Reason for Discontinue: Discontinue Prescription	180	PRN	1/31/2012	1/15/2013
<b>TRIAMCINOLONE ACETONIDE 0.1 % TOP OINT</b> Sig : APPLY TO AFFECTED AREA A THIN LAYER TWICE DAILY Route: Topical Class: Fill Later	45	0.69/2	1/31/2011	1/31/2012
<b>PROAIR HFA 90 MCG/ACTUATION INHL HFAA</b> Sig : INHALE TWO PUFFS EVERY FOUR TO SIX HOURS AS NEEDED FOR WHEEZING AND COUGH Route: Inhalation Class: Fill Later	8.5	0/0	9/7/2010	10/7/2010
<b>CHOLECALCIFEROL (VITAMIN D3) 1000 UNIT</b>	100	PRN	6/9/2010	

REDACTED

**ORAL TAB**

Sig : Take 1 tab once daily for vitamin D deficiency.

Route: Oral

**DOXEPIN 10 MG ORAL CAP** 60 0.33/1 8/13/2009 8/13/2010

Sig : TAKE ONE CAPSULE ORALLY EVERY NIGHT AT BEDTIME FOR SLEEP AND ITCHING

Route: Oral

Class: Fill Later

**ASPIRIN 81 MG ORAL CHEW TAB** 36 PRN 8/13/2009

Sig : CHEW 1 TAB PO ONCE DAILY FOR PREVENTION OF HEART ATTACK AND STROKE

Route: Oral

Class: Fill Later

**OMEGA-3 FISH OIL 1,000 MG-5 UNIT CAP** 90 PRN 5/13/2006

Sig : TAKE AS DIRECTED

Route: Oral

Class: OTC

**VITAMIN E 400 UNIT CAP** 100 0/0 5/13/2006

Sig : Pt is taking 1 capsule once daily

Route: Oral

Class: OTC

**Inpatient Medications**

	Dose	Frequency	Start	End
<b>VICODIN 5-500 mg 2 Tab (Hydrocodone-Acetaminophen)</b>	2 Tab	EVERY 4 HOURS AS NEEDED	2/25/2005 0542	(none)
Route: Oral Admin Dose: 2 Tab				
<b>PERCOCET 5-325 mg 1 Tab (Oxycodone-Acetaminophen)</b>	1 Tab	EVERY 3 HOURS AS NEEDED	2/25/2005 0542	(none)
Route: Oral Admin Dose: 1 Tab				
<b>PERCOCET 5-325 mg 2 Tab (Oxycodone-Acetaminophen)</b>	2 Tab	EVERY 3 HOURS AS NEEDED	2/25/2005 0542	(none)
Route: Oral Admin Dose: 2 Tab				

## Example Case 2

Encounter Date: 06/24/2013

**Office Visit**

6/24/2013 Office Visit

Patient Name | MRN:

**Visit Summary**

**Encounter Information**

Date & Time	Provider	Department	Encounter #	Center
6/24/2013 2:10 PM	XXX (M.D.)			REDACTED

**Reason for Visit**

NUMBNESS

**Diagnoses**

MAJOR DEPRESSION, RECURRENT - Primary	296.30
PERIPHERAL NEUROPATHY	356.9
ATHEROSCLEROSIS AORTA	440.0
CKD STAGE 3 (GFR 30-59)	585.3
HYPERLIPIDEMIA	272.4
HTN	401.9
GERD (GASTROESOPHAGEAL REFLUX DISEASE)	530.81
H PYLORI INFECTION	041.86

**After Visit Summary**

After Visit Summary

**Vitals - Last Recorded**

BP	Pulse	Temp	Resp	Ht	Wt
118/65	62	97 °F (36.1 °C)	17	5' 4.5"	200 lb (90.719 kg)
BMI	SpO2				
33.81 kg/m2	99%				

**ALCOHOL SCREENING**

How many times in the past three months have you had four or more drinks containing alcohol in a day?: 0  
 On average, how many days a week do you have an alcoholic drink?: 0  
 On a typical drinking day, how many drinks do you have?: 1

**EXERCISE VITALS**

06/24/2013	08/22/2012	04/27/2012	01/03/2012
40 minutes	140 minutes	140 minutes	Not addressed

**All Flowsheet Data (all recorded)**

Encounter Vitals	
	06/24/13
	1409
<b>Enc Vitals</b>	
BP	118/65 mmHg
Pulse	62
Resp	17
Temp	97 °F (36.1 °C)
SpO2	99 %
Weight	200 lb (90.719 kg)
Height	5' 4.5"

Not recorded

**Visit Notes**

MA Name, MA Mon Jun 24, 2013 2:10 PM  
 Preventative Health Prompts reviewed with patient  
 Domestic Violence screening done

Encounter Date: 06/24/2013

**Progress Notes**

XXX (M.D.) at 6/24/2013 4:54 PM

Status: Signed

**Clinical Progress Note:**

Patient presents with a chief complaint of NUMBNESS

HPI: (Patient name) is a 77 Y , who presents for

DEPRESSION, MAJOR, RECURRENT (primary encounter diagnosis)  
NEUROPATHY, PERIPHERAL  
ATHEROSCLEROSIS AORTA  
CKD STAGE 3 (GFR 30-59)  
HYPERLIPIDEMIA  
HYPERTENSION  
GERD

Note: stable with her medications now.

Still has this tingling at her bilaterally fingers and toes since 05. No injury. Worry about diabetes mellitus. Wants to check lab.

Have reviewed lab from last year. No diabetes mellitus.

HELICOBACTER PYLORI INFECTION

Note: treated before. Needs check stool test.

I have reviewed (Patient)

medical history with no changes 6/24/2013 and social history with no changes 6/24/2013

**Current Outpatient Prescriptions:**

Lisinopril-Hydrochlorothiazide (PRINZIDE/ZESTORETIC) 20-12.5 mg Oral Tab, Take 1 tablet orally 2 times a day (Due for fasting lab and follow up with Primary Care Doctor before next refill)

Sertraline (ZOLOFT) 100 mg Oral Tab, Take 1 tablet orally daily

Review system: Review system: Review of Systems - History obtained from the patient

General ROS: negative for - chills or fever

Psychological ROS: negative for - anxiety, disorientation, hallucinations, hostility or irritability

Respiratory ROS: no cough, shortness of breath, or wheezing

Cardiovascular ROS: no chest pain or dyspnea on exertion

Gastrointestinal ROS: no abdominal pain,

Musculoskeletal ROS: negative for - gait disturbance, joint pain, joint stiffness, joint swelling, muscle pain or muscular weakness

Neurological ROS: no TIA or stroke symptoms

**Physical Examination:**

BP 118/65 | Pulse 62 | Temp 97 °F (36.1 °C) | Resp 17 | Ht 5' 4.5" | Wt 200 lb (90.719 kg) | BMI 33.80 kg/m2 | SpO2 99% General appearance - vital signs reviewed and alert, well appearing, and in no distress

Mental status - alert, oriented to person, place, and time

Respiratory - clear to auscultation, no wheezes, rales or rhonchi, symmetric air entry

Cardiovascular - normal rate and regular rhythm, normal S1, S2, no murmurs,

Bilaterally hands and feet- Range of motion and muscle strength and sensation are within normal limits. Skin color is within normal limits. Peripheral pulse are within normal limits.

Negative for tinel's and phalet's sign

**Data Reviewed:**

WBC 6.2 08/22/2012

HCT 43.4 08/22/2012

Encounter Date: 06/24/2013

HGB	14.0	08/22/2012
PLT	187	08/22/2012
CHOL	185	04/17/2012
HDL	44	04/17/2012
LDL CALC	117	04/17/2012
TRIG	121	04/17/2012
ALT	15	08/22/2012
AST	17	08/22/2012
BUN	16	08/22/2012
CREAT	1.08	08/22/2012
GFR-AFRAM	60	08/22/2012
GFR NONAFR AMER	49	08/22/2012
GFR-NONAFRAM	>60	07/14/2011
K	4.3	04/17/2012
NA	142	04/17/2012
TSH	1.14	04/17/2012
GLUC FAST	82	04/17/2012
HGBA1C %	5.9	08/22/2012
ESTIMATED AVERAGE GLUCOSE	123	08/22/2012

**Assessment & Plan:**

DEPRESSION, MAJOR, RECURRENT (primary encounter diagnosis)

NEUROPATHY, PERIPHERAL

ATHEROSCLEROSIS AORTA

CKD STAGE 3 (GFR 30-59)

HYPERLIPIDEMIA

HYPERTENSION

GERD

Note: most likely still her neuropathy since 05. Monitor. Repeat lab to rule/out diabetes mellitus.

**HELICOBACTER PYLORI INFECTION**

Note: check stool test.

Plan: HELICOBACTER PYLORI ANTIGEN, STOOL

As needed follow up if not well after the medications or early if worse the patient's symptoms.

Understood the instructions well today. The patient is happy with the plan. The patient is satisfied with the care getting today.

Patient understands that it is the patients responsibility to call for questions or follow-up appointments for all reasons including routine health maintenance visits appropriate for patient's ages.

The patient may call me or e-mail me if the patient has any questions. My phone number is . For any medical information you can check my website at <http://www.permanente.net/doctor>

Electronically signed by XXX, MD

**Scans****Encounter-Level Documents:**

There are no encounter-level documents.

Encounter Date: 06/24/2013

**Order-Level Documents:**

There are no order-level documents.

**Patient-Level Documents:**

There are no patient-level documents.

**Instructions and Follow-Up**

**Patient Instructions**

None

**Future Appointments**

None

**Misc Information**

**Level of Service**


OUTPT EST LEVEL 4 [99214B]

**Encounter Status**

Closed by XXX, M.D.) on 6/24/13 at 4:54 PM

**Electronically signed by:**

Signed	Title	Date	Time
XXX	MEDICAL DOCTOR	Jun 24, 2013	16:54:51

Re: Revision to Draft Question to AHA Coding Clinic on AA 

Gloryanne H Bryant to: Nancy J Andersen

Cc: Diana Medal, Janet D Franklin

Default custom expiration date: 11/17/2015

11/17/2014 05:41 AM

Good morning, I'm fine with the letter and revisions.

Gloryanne Bryant, RHIA, CDIP, CCS, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
"I Support ICD-10 Implementation in 2015"  
National Director Coding Quality, Education, Systems and Support  
National Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1 Kaiser Plaza- 15th floor, Office #1543, Oakland, CA 94612  
510 267-7559 (tel)  
510 267-7606 (fax)  
email: Gloryanne.h.bryant@kp.org  
kp.org.thrive  
<http://insidekp.kp.org/finance/revenuecycle>  
National Coding Quality Wiki Site: <https://wiki.kp.org/wiki/display/coding/HOME>

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Nancy J Andersen

Hi Janet, I had received feedback from Simon a...

11/16/2014 10:23:49 PM

From: Nancy J Andersen/CA/KAIPERM  
To: Janet D Franklin/PO/KAIPERM@KAIPERM  
Cc: Gloryanne H Bryant/CA/KAIPERM@KAIPERM, Diana Medal/PO/KAIPERM@KAIPERM  
Date: 11/16/2014 10:23 PM  
Subject: Revision to Draft Question to AHA Coding Clinic on AA

---

Hi Janet,

I had received feedback from Simon a while ago regarding your initial draft of the AA question for Coding Clinic. He did not want any reference made to "copy and paste". I have made a few minor revisions to your original letter; please take a look and let me know if you agree with the revisions.

Gloryanne and Diana - please also review the revisions and provide feedback, thanks!

[attachment "Aortic Atherosclerosis Packet for Coding Clinic, Draft 2.pdf" deleted by Gloryanne H Bryant/CA/KAIPERM]

Nancy J. Andersen, MS, RHIA, CCS, AHIMA-Approved ICD-10-CM/PCS Trainer  
Senior Compliance Manager, Care Delivery and Health Information Management Compliance  
National Compliance, Ethics and Integrity Office  
Kaiser Foundation Health Plan, Inc.  
Cellphone: 510-418-2455  
[nancy.j.andersen@kp.org](mailto:nancy.j.andersen@kp.org)

*"I Support ICD 10 Adoption and implementation in 2015"*

VH00095

REL0000204

*Embed a culture of compliance across the care delivery enterprise that inspires the highest level of ethics and integrity*

**Kaiser Permanente does the right thing by promoting ethics in decision making and integrity in all actions.**

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# **EXHIBIT 14**

NCAL



**High Priority / Time Critical Meeting: Discuss Viewpoints and Prepare Response from NCAL to NCO on Capture of AA ICD4400.**

**Marcus Lee** to: Mitchell M Law

07/23/2014 12:38 PM

Cc: Sue Muscarella, Lindy A Petersen, Gloryanne H Bryant, Nancy J Andersen, Danielle Sheetenhelm, Dawna M Toews, Amy S Kane

Default custom expiration date: 07/23/2015

---

History: This message has been replied to and forwarded.

Hi Mitch,

Please schedule a high priority and time critical meeting early next week with the following:

Subject: Discuss Viewpoints and Prepare Response from NCAL to NCO on Capture of AA ICD4400.

Victoria Hernandez (key)  
GloryAnne Bryant (key)  
Nancy Andersen (key)  
Lindy Petersen (key)  
Marcus Lee (key)  
Sue Muscarella (would like key members to meet if she cannot attend)  
Danielle Sheetenhelm  
Dawna Toes  
Amy S Kane

Web ex is good.

Attendees - please let me know if you have any questions!

Thanks everyone for trying to make this meeting happen.

Marc

Marcus Lee  
Director, Auditing and Coding Services  
The Permanente Medical Group, Inc.  
Encounter Information Operations  
1950 Franklin St., 7th Floor  
Oakland, CA. 94612  
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marcus.lee@kp.org

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VH00098

REL0000206

# **EXHIBIT 15**

# Coding Governance Group (CGG)

**DRAFT  
V10**

July 31, 2014  
11:00 – 12:30 PST  
Agenda Packet

REVIEW0014444  
VH00100

**DRAFT**

# Coding Governance Group Meeting Agenda

Time	Item	Facilitator
11:00	Call to Order Announcements & Introductions Review of Apr. Minutes	Simon Cohn Tammi Keating
11:10	Follow up: CGG Charter	Simon Cohn Tammi Keating
11:20	Documentation and Coding Committees: Relationship of other documentation and coding forums to CGG	Nancy Andersen
11:35	Follow up: Coding Question Process Flowchart	Nancy Andersen
11:55	NCO Telehealth Documentation and Coding Reference Document	Nancy Andersen
12:05	Request to add Aortic Atherosclerosis to KP Always Code List as a Chronic Condition	Nancy Andersen Gloryanne Bryant
12:25	Wrap Up; Future Agenda Topics; Action Items for Next Meeting	Simon Cohn Tammi Keating

VH00101

# Request to Add Aortic Atherosclerosis to KP Always Code List

## Background:

- AA Dx is a HCC: reimbursement impact
- Recent NCO Probe audit designated coding of AA as Chr. Systemic as an error

## Recommendation:

- Request Aortic Atherosclerosis Dx be included in the KP Chronic Systemic Condition – Inpatient Always Code List
- Allow for Hospital OP reporting as well

## Request

- ▶ CGG and NCO support recommendations

VH00102

## Information to Substantiate the Request

- Current KP *Always Code List* and process for inclusion
- Clinical rationale (NCAL)
- Coding Rules
- Documentation & MA requirements
- Coding Clinic guidelines and response to question

# KP Hospital Inpatient *Always Code List* (con't)

•Based on Coding Guidelines, Kaiser has developed the Documentation and Coding Guideline for coding of such systemic diseases for Kaiser Foundation Hospitals, referred to as the “Always Code List” Guideline.

<p><b>Systemic Conditions - List A</b> Examples of systemic conditions always to be coded include, but are not limited to, the following:</p> <ul style="list-style-type: none"><li>• AIDS</li><li>• Asthma, chronic obstructive</li><li>• Atherosclerosis, generalized</li><li>• Bronchitis, chronic obstructive</li><li>• Collagen vascular disease</li><li>• COPD</li><li>• Diabetes mellitus</li><li>• Emphysema</li><li>• Hypertension</li><li>• Systemic lupus erythematosus</li><li>• Multiple sclerosis</li><li>• Parkinson's disease</li><li>• Peripheral vascular disease</li><li>• Chronic kidney disease</li><li>• Rheumatoid arthritis</li><li>• <b>*Note: Attending physician confirmation of clinical significance of all radiology findings is required for inpatients per Coding Clinic.</b></li></ul>
---

The following table includes a list of secondary conditions that Kaiser has determined will always be coded, even though the conditions may not impact the patient's current stay. These conditions are pertinent to Kaiser's patient-mix data and conduction of health care studies. Coding of other secondary conditions is left to the discretion of each facility. Each facility must develop a written guideline regarding the coding of any additional conditions.

## KP Inpatient *Always Code List*

- A flow chart was developed within the Always Code List to assist in determining if a secondary condition should be coded.
- Flowchart steps:
  - 1. Determine if the condition is a systemic one. If so, code it.
  - 2. If not systemic, did it impact the patient's care as defined above? If so, code it.
  - 3. If it is not systemic and does not impact the patient's current care, is it on Kaiser's list of V codes always to be coded? If so, code it.
  - 4. If it does not meet any of these criteria, it is **not** to be coded.
- Coding of other secondary conditions is left to the discretion of each facility. Each facility must develop a written guideline regarding the coding of any additional conditions.
- The list was developed to include only conditions that do NOT have an impact on reimbursement.


## Coding: UHDDS Definition of Secondary Diagnosis Reporting

- ▶ Those conditions that affect the episode of hospital care in terms of any of the following:
  - Clinical evaluation
  - Therapeutic treatment
  - Further evaluation by diagnostic studies, procedures, or consultation
  - Extended length of hospital stay
  - Increased nursing care and/or other monitoring

**Note: For inpatient coding, you only need to meet one of the criteria for “other diagnosis” reporting.**

# KP Criteria for MA Risk Adjustment Diagnosis Reporting

- A diagnosis will always be coded and is acceptable for submission to CMS as risk adjustment data, even in the absence of expressly documented active treatment, evaluation, or intervention by the physician, if the condition meets all four of the following criteria:
  - ▶ 1) The condition is always present, even though it may have been stabilized; AND
  - ▶ 2) By its very nature (because of its impact on the patient), the condition must be considered by the physician in evaluating the patient's chief complaint; AND
  - ▶ 3) The condition affects a major body system (and, typically, more than one major body system), which include the following:



Cardiovascular; AND/OR	Hematologic/Lymphatic/Immunologic; AND/OR
Respiratory; AND/OR	Neurologic; AND/OR
Gastrointestinal; AND/OR	Psychiatric; AND
Renal; AND/OR	

- ▶ 4) The physician indicates that he/she considered the diagnosis by documenting the diagnosis in the medical record for the encounter.

## Coding: *AHA Coding Clinic* Guidelines on Chronic Systemic Conditions

### ▶ *AHA Coding Clinic* definition of other/secondary diagnoses:

- Inpatient Coding - Conditions that affect patient care in terms of requiring:
  - Clinical evaluation; or therapeutic treatment; or diagnostic procedures; or extended length of hospital stay; or increased nursing care and/or monitoring.
  - Systemic diseases are always coded, even in the absence of documented active intervention since these types of conditions meet one or more of the elements of the definition given above. (*AHA Coding Clinic*, Second Quarter, 1990, page 14).
  
- Outpatient Coding:
  - Code all documented conditions that coexist at the time of the encounter/visit, and require or affect patient care, treatment, or management. Do not code conditions that were previously treated and no longer exist. However, history codes (V10-V19) may be used as secondary codes if the historical condition or family history has an impact on current care or influences treatment.
  - Chronic diseases treated on an ongoing basis may be coded and reported as many times as the patient receives treatment and care for the condition(s).
  - Incidental findings on outpatient radiology reports: It is inappropriate to report an incidental finding found on a radiology report when the finding is unrelated to the sign, symptom, or condition that necessitated the performance of the test . . . The . . . physician would need to clarify that the finding was clinically significant and related to the visit in order for it to be coded. (*AHA Coding Clinic*, Third Quarter 2010, pages 8-9).

## Question Submitted to AHA Coding Clinic

Many physicians believe that the diagnosis/condition of Aortic Atherosclerosis is a Chronic Systemic Condition. We had our physicians provide education about this condition and this included risk factors with AA:

- Dyslipidemia (high LDL, low HDL): high cholesterol
- Diabetes
- Smoking
- Obesity
- Metabolic Syndrome (abdominal obesity, along with at least 2 of the following: dyslipidemia, hypertension, insulin resistance)

- Hyperinsulinemia
- Prothrombotic states
- Hypertension
- Renal insufficiency
- Systemic infections
- Age
- Family history
- Sedentary lifestyle

Thus, like COPD or Diabetes Mellitus, CAD, Lupus, should we code Aortic Atherosclerosis condition when documented, either outpatient or inpatient record similar to COPD? Thank you.

# AHA Coding Clinic Response

## Central Office on ICD-9-CM

American Hospital Association  
155 N. Wacker Drive, Suite 400  
Chicago, IL 60606-1726  
312-422-3366  
312-278-0838

May 16, 2013

Gloryanne Bryant  
Regional HIM  
Kaiser Permanente  
1800 Harrison St., #24  
Oakland, CA 94612

Dear Ms. Bryant,

This letter is in response to your request for clarification if it is appropriate to report aortic atherosclerosis as a chronic systemic condition.

When a patient has a chronic systemic condition that affects the patient the rest of his/her life, it is appropriate to assign a code for that condition.

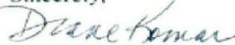
As stated in *Coding Clinic* 3<sup>rd</sup> Quarter, 2007, Pages 13-14; "Chronic conditions such as, but not limited to, hypertension, Parkinson's disease, COPD, and diabetes mellitus are chronic systemic diseases that ordinarily should be coded even in the absence of documented intervention or further evaluation. Some chronic conditions affect the patient for the rest of his or her life and almost always require some form of continuous clinical evaluation or monitoring during hospitalization, and therefore should be coded." This advice applies to inpatient coding.

For outpatient encounters/visits, chronic conditions that require or affect patient care treatment or management should be coded. The Official Guidelines for Coding and Reporting for Outpatient Services, state, "Chronic diseases treated on an ongoing basis may be coded and reported as many times as the patient receives treatment and care for the conditions(s). Code all documented conditions that coexist at the time of the encounter/visit and require or affect patient care treatment or management. Do not code conditions that were previously treated and no longer exist. Conversely, conditions that do not require or affect patient care, treatment or management are not reported."

If the coder is unclear whether a specific condition meets the definition of a chronic or secondary diagnosis, it is appropriate to query the provider for clarification. Please see *Coding Clinic*, Second Quarter 2000 Pages: 20-21.

I trust this information will be of assistance to you.

Sincerely,

  
Diane Komar, RHIT  
Coding Consultant  
Ref. #50001447.213

AHA CENTRAL OFFICE

An American Hospital Association Service



This coding information is being provided specifically to you based on the facts and details you provided. The American Hospital Association has used its best efforts to provide accurate coding advice, but this advice should not be construed as providing clinical advice, dictating reimbursement policy, or a substitution for the judgment of a practitioner. This information is provided for individual reference only. Any reprint or distribution of all or part of this correspondence, without the express written consent of the American Hospital Association's Central Office on ICD-9-CM, is strictly prohibited.

VH000110

## KP MA: Documentation and Coding Reportable Systemic Conditions (con't)

- Systemic conditions always to be coded include, but are not limited to, the following:

- AIDS
- Lupus
- Atherosclerosis, generalized
- Multiple sclerosis
- Collagen vascular disease
- Parkinson's Disease
- Diabetes mellitus
- Renal Failure, Chronic
- Hypertension
- Rheumatoid Arthritis

### KAISER PERMANENTE PROGRAM ADVISORY

#### MEDICARE ADVANTAGE RISK ADJUSTMENT DATA DOCUMENTATION AND AUDITING STANDARDS FOR DIAGNOSIS CODING

This Kaiser Permanente Program Advisory is intended to clarify the minimum amount and type of documentation necessary to support the diagnoses submitted to the Centers for Medicare & Medicaid Services (CMS) as Medicare Advantage risk adjustment data. This advisory is intended to be used to define the standards for auditing the data that is submitted to CMS as risk adjustment data, and ensuring that the minimum CMS documentation standards are met for this data.<sup>1</sup>

This Advisory is based on the Instructions for the 2003 Contract Year (the "2003 Instructions"), the CMS Risk Adjustment Data Validation Guidelines (the Guidelines), telephone conferences with CMS to clarify those Guidelines, the CMS 2004 Regional Risk Adjustment Training for Medicare+Choice Organizations Participant Guide (2004 Training Guide), the CMS 2004 Regional Risk Adjustment Training for Medicare+Choice Organizations Questions & Answers (2004 Q&A), the CMS 2005 Risk Adjustment Data Basic Training for Medicare Advantage Organizations Participant Guide (2005 Training Guide), the Advance Notice of Methodological Changes for Calendar Year (CY) 2006 Medicare Advantage (MA) Payment Rates (2006 Advance Notice), the Announcement of CY 2007 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies (2007 Notices), the CMS 2007 Risk Adjustment Data Basic Training for Medicare Advantage Organizations Participant Guide (2007 Training Guide), the Medicare Managed Care Manual (CMS Pub. 100-16), and the ICD-9-CM Coding Guidelines (Coding Guidelines). CMS continues to provide updates on these issues and the Program Advisories will be updated periodically to reflect this updated CMS guidance.

<sup>1</sup> Regions and medical groups may choose to create stricter standards for documentation of diagnoses in the medical records. However, it would not be appropriate to use those stricter standards to audit the accuracy of the submission of risk adjustment data to CMS, since the use of stricter standards may lead to the failure to submit data to CMS that is appropriately documented in the medical record. Also, it would be difficult to accurately compare the accuracy of data submitted in different Kaiser

## Inpatient Documentation

- ▶ Currently inpatient documentation of AA requires the physician to document the clinical significance when the condition is noted on a radiology report (e.g. CT, Chest X-ray).

## Discussion

- The diagnosis of aortic atherosclerosis has potential financial impact to the organization.
- NCO does not currently recognize aortic atherosclerosis as a chronic, systemic condition.
- Regional Request: Aortic Atherosclerosis Dx be included in the KP Chronic Systemic Condition – Always Code Lis and allow for Hospital OP reporting as well.

## Potential CGG Determinations

- Accept original Coding Clinic answer which requires a query if impact is not discernable.
  - Coding Clinic response appears to negate AA as a systemic condition as queries are never required for impact of systemic conditions
  - Cannot be added to the “Always Code” list as this list includes those conditions that are to be always be coded even though they do NOT impact the encounter.
- Recommend second question to Coding Clinic with more detail, scenarios, and pro and con perspectives of coding the provided scenarios without the need to query.
  - NCO to send a second question to AHA Coding Clinic with more detail, examples of documentation of aortic atherosclerosis currently found in KPHC inpatient and physician office settings of care (redacted phi) and pro and con perspectives of coding the provided examples in the absence of the ability to query.
  - Request clarification on the question of whether this condition is considered a chronic, systemic condition.
  - NCO will base the decision of adding this condition to the KP Always Code List on the response received from AHA Coding Clinic.
  - If a decision is made to add the condition to the KP Always Code List, add to the “Systemic Condition” list. This action will be communicated to each region and PMG.

# Appendix



# **EXHIBIT 16**

To: Nancy J Andersen/CA/KAIPERM@KAIPERM  
Cc: Janet D Franklin/PO/KAIPERM@KAIPERM, Rizalyn A Andrews/CA/KAIPERM@KAIPERM  
Date: 04/08/2016 10:23 AM  
Subject: Re: Followup Question regarding AA documentation etc.

---

Do you want me to draft the question since we already have the answer?  
I'm worried because we found in the ICD-10 assmt AA being coded when it should not have.

Gloryanne Bryant, RHIA, CDIP, CCS, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
National Director Coding Quality, Education, Systems and Support  
National Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1 Kaiser Plaza- 15th floor, Office #1543, Oakland, CA 94612  
510 267-7559 (tel)  
510 267-7606 (fax)  
email: Gloryanne.h.bryant@kp.org  
kp.org.thrive  
<http://insidekp.kp.org/finance/revenuecycle>  
National Coding Quality Wiki Site: <https://wiki.kp.org/wiki/display/coding/HOME>

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Nancy J Andersen I agree it should be posted in the coding bulletin... 04/08/2016 10:18:25 AM

From: Nancy J Andersen/CA/KAIPERM  
To: Gloryanne H Bryant/CA/KAIPERM@KAIPERM  
Cc: Janet D Franklin/PO/KAIPERM@KAIPERM, Rizalyn A Andrews/CA/KAIPERM@KAIPERM  
Date: 04/08/2016 10:18 AM  
Subject: Re: Followup Question regarding AA documentation etc.

---

I agree it should be posted in the coding bulletin board for reference by all regions.

Nancy J. Andersen, MS, RHIA, CCS, AHIMA-Approved ICD-10-CM/PCS Trainer  
Senior Compliance Manager, Government Audit and Reimbursement  
National Compliance, Ethics and Integrity Office  
Kaiser Foundation Health Plan, Inc.

510-418-2455  
nancy.j.andersen@kp.org  
**NCO Care Delivery HIM SharePoint Site:**  
<https://sites.sp.kp.org/teams/cdc2/cdc3/SitePages/Home.aspx>

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Gloryanne H Bryant Hi, This coding is still coming up and SCAL did... 04/08/2016 09:34:42 AM

From: Gloryanne H Bryant/CA/KAIPERM  
To: Janet D Franklin/PO/KAIPERM@KAIPERM  
Cc: Nancy J Andersen/CA/KAIPERM@KAIPERM, Rizalyn A Andrews/CA/KAIPERM@KAIPERM  
Date: 04/08/2016 09:34 AM

Subject: Re: Followup Question regarding AA documentation etc.

---

Hi, This coding is still coming up and SCAL did not know about the guidance from August (below) that this is not a systemic condition, we'd like to request that we post this on the National Bulletin Board, can that be done?.

Gloryanne Bryant, RHIA, CDIP, CCS, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
National Director Coding Quality, Education, Systems and Support  
National Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1 Kaiser Plaza- 15th floor, Office #1543, Oakland, CA 94612  
510 267-7559 (tel)  
510 267-7606 (fax)  
email: Gloryanne.h.bryant@kp.org  
kp.org.thrive  
<http://insidekp.kp.org/finance/revenuecycle>  
National Coding Quality Wiki Site: <https://wiki.kp.org/wiki/display/coding/HOME>

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Janet D Franklin      [Hi Gloryanne, After having gone through clinicia...](#)      08/04/2015 03:04:25 PM

From: Janet D Franklin/PO/KAIPERM  
To: Gloryanne H Bryant/CA/KAIPERM  
Cc: Nancy J Andersen/CA/KAIPERM@KAIPERM, Rizalyn A Andrews/CA/KAIPERM@KAIPERM, Simon Cohn/PO/KAIPERM@KAIPERM  
Date: 08/04/2015 03:04 PM  
Subject: Re: Followup Question regarding AA documentation etc.

---

Hi Gloryanne,

After having gone through clinician review, AA is not considered a systemic condition and will not appear on the final list of examples of systemic conditions. The clinician must do more than just list this condition. There must be documentation to show how it impacted the current encounter. It will be up to the region to decide if they want to query the provider about this condition when it is only listed. Without a query and additional documentation from the provider to show how it impacted the encounter, it cannot be coded.

Thanks,

Janet (don't forget the) D Franklin

Janet D Franklin, RHIT, CCS, CCS-P, CHC  
AHIMA Approved ICD-10-CM/PCS Trainer  
Compliance Manager, Government Audit and Reimbursement  
National Compliance, Ethics & Integrity Office  
Office: 8-423-5735, 510-271-5735  
Fax: 8-423-5039, 510-891-5039

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Gloryanne H Bryant      [Good morning, In the past year + there has bee...](#)      08/04/2015 05:50:51 AM

# **EXHIBIT 17**

# Aortic Atherosclerosis Dx Freq Report 2010-2016

VH00120

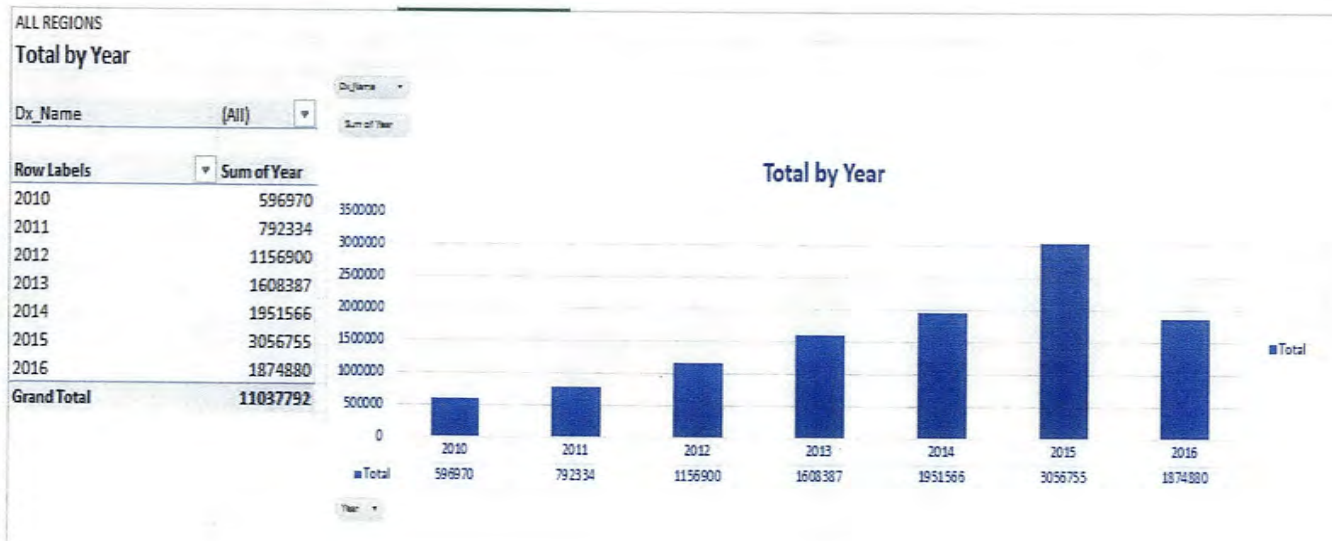
REL0000225

# ALL REGIONS



VH000121

# ALL REGIONS

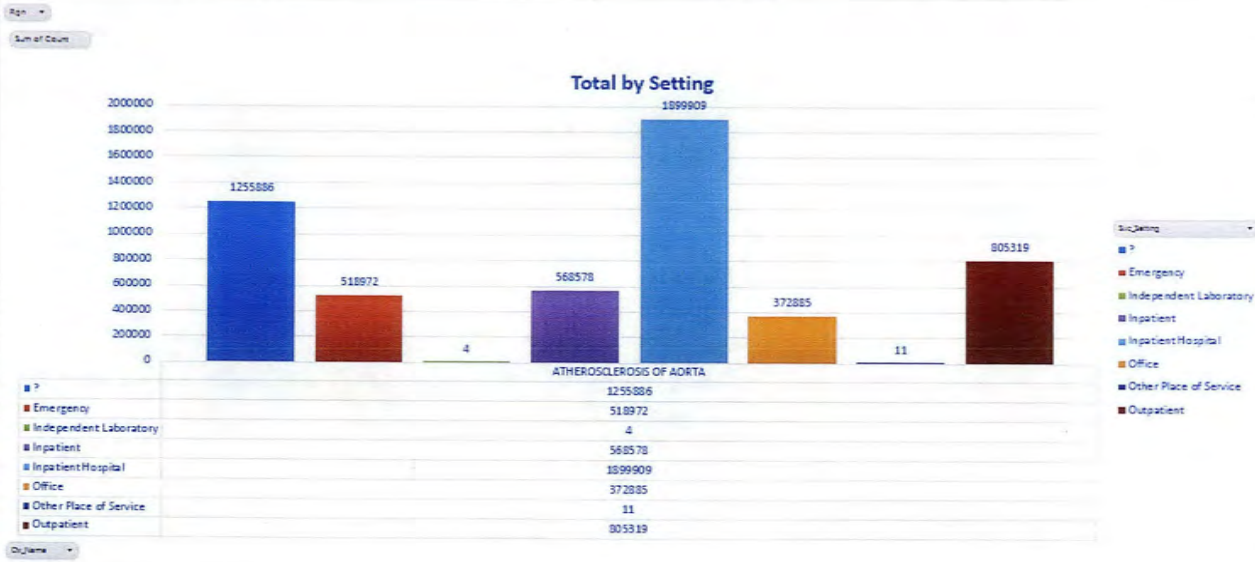


**Total by Setting** ALL REGIONS

Rgn (All)

Sum of Count Column La

Row Labels	?	Emergency	Independent Laboratory	Inpatient	Inpatient Hospital	Office	Other Place of Service	Outpatient	Grand Total
ATHEROSCLEROSIS OF AORTA	1255886	518972	4	568578	1899909	4E+05	11	805319	5421564
<b>Grand Total</b>	<b>1255886</b>	<b>518972</b>	<b>4</b>	<b>568578</b>	<b>1899909</b>	<b>4E+05</b>	<b>11</b>	<b>805319</b>	<b>5421564</b>

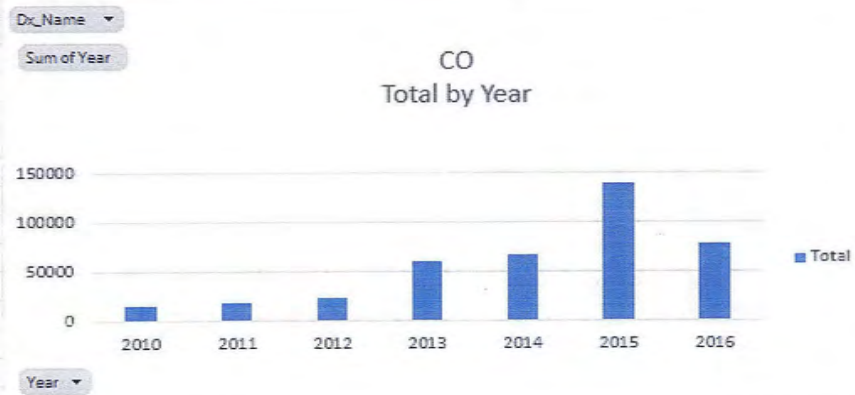


**Total**

Row Labels	Sum of Count
ATHEROSCLEROSIS OF AORTA	5421564
<b>Grand Total</b>	<b>5421564</b>

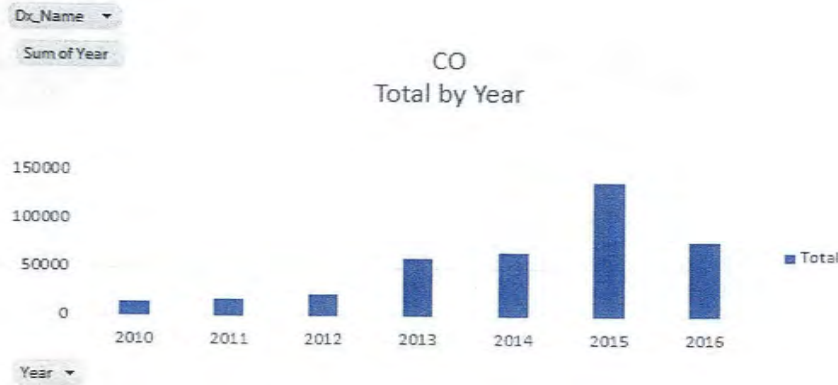
# CO Region

Dx_Name	(All)
Row Labels	Sum of Year
2010	16080
2011	18099
2012	24144
2013	60390
2014	66462
2015	139035
2016	78624
<b>Grand Total</b>	<b>402834</b>

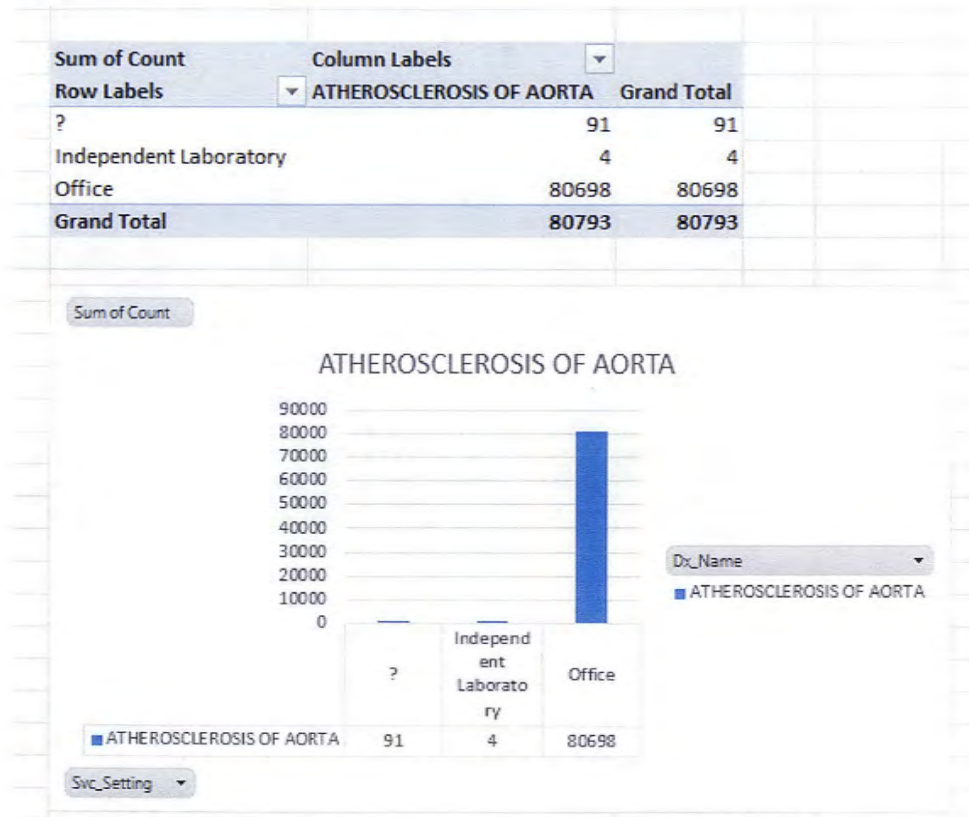


# CO Region

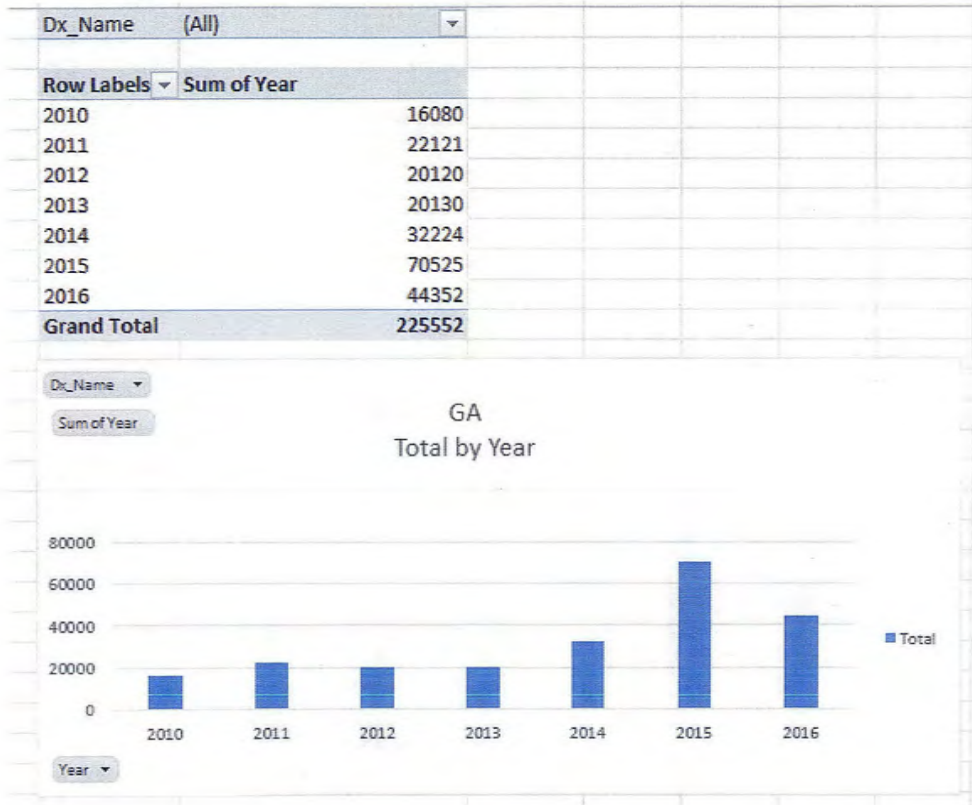
Dx_Name (All)	
Row Labels	Sum of Year
2010	16080
2011	18099
2012	24144
2013	60390
2014	66462
2015	139035
2016	78624
<b>Grand Total</b>	<b>402834</b>



# CO Region (cont.)



# GA Region



VH000127

# GA Region

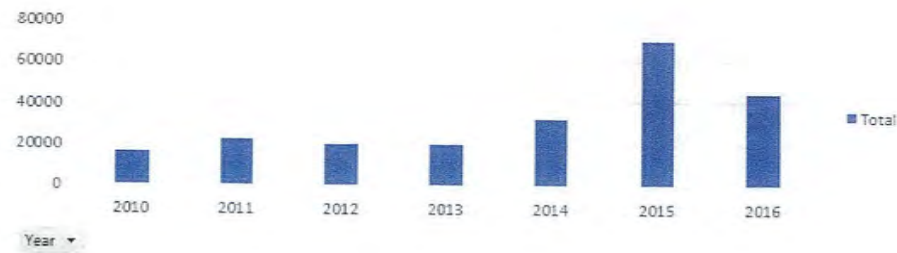
Dx\_Name (All) ▾

Row Labels ▾	Sum of Year
2010	16080
2011	22121
2012	20120
2013	20130
2014	32224
2015	70525
2016	44352
<b>Grand Total</b>	<b>225552</b>

Dx\_Name ▾

Sum of Year

GA  
Total by Year



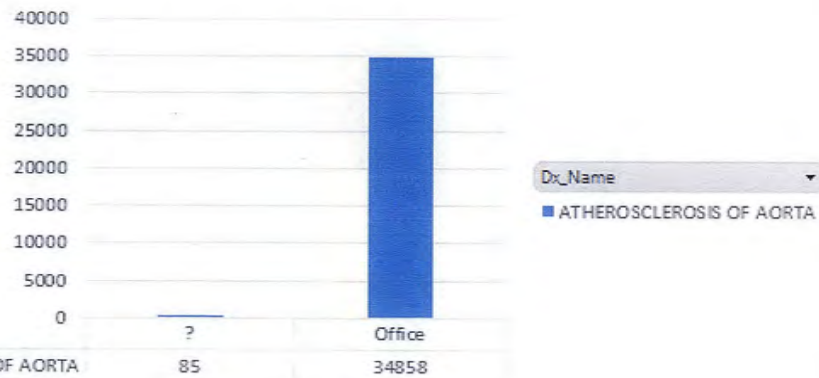
Year ▾

# GA Region (cont.)

Sum of Count	Column Labels	
Row Labels	ATHEROSCLEROSIS OF AORTA	Grand Total
?	85	85
Office	34858	34858
<b>Grand Total</b>	<b>34943</b>	<b>34943</b>

Sum of Count

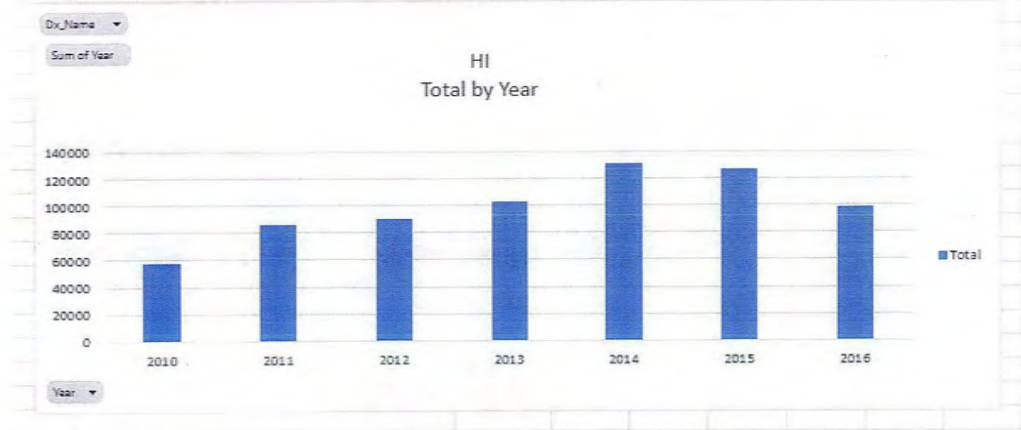
ATHEROSCLEROSIS OF AORTA



Svc\_Setting

# HI Region

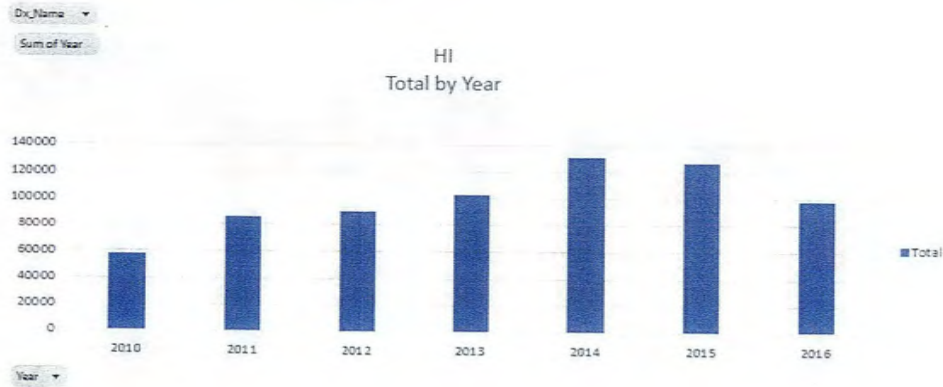
Dx_Name	(All)
Row Labels	Sum of Year
2010	58290
2011	86473
2012	90540
2013	102663
2014	130910
2015	126945
2016	98784
<b>Grand Total</b>	<b>694605</b>



# HI Region

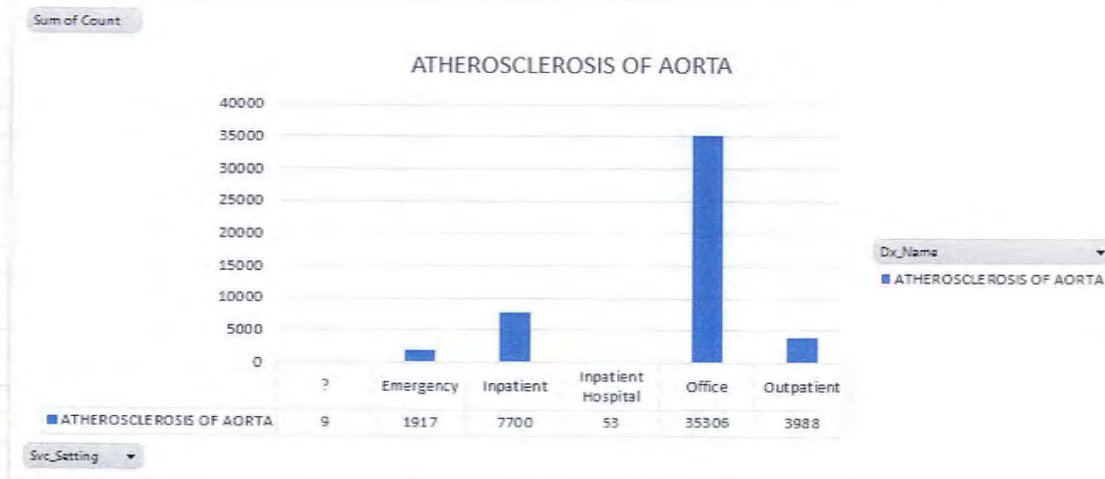
Dx\_Name (All) ▾

Row Labels	Sum of Year
2010	58290
2011	86473
2012	90540
2013	102663
2014	130910
2015	126945
2016	98784
<b>Grand Total</b>	<b>694605</b>



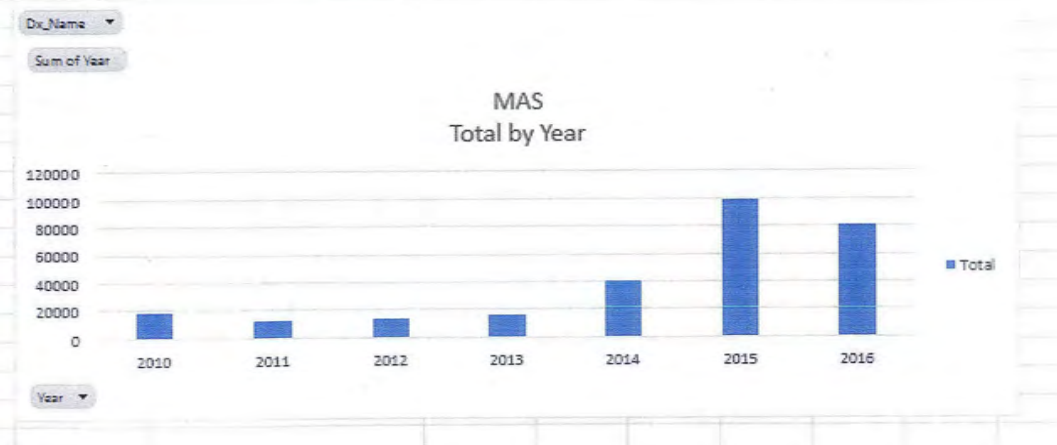
# HI Region (cont.)

Sum of Count	Column Labels	
Row Labels	ATHEROSCLEROSIS OF AORTA	Grand Total
?	9	9
Emergency	1917	1917
Inpatient	7700	7700
Inpatient Hospital	53	53
Office	35306	35306
Outpatient	3988	3988
<b>Grand Total</b>	<b>48973</b>	<b>48973</b>



# MAS Region

Dx_Name	(All)
Row Labels	Sum of Year
2010	18090
2011	12066
2012	14084
2013	16104
2014	40280
2015	98735
2016	80640
<b>Grand Total</b>	<b>279999</b>



VH00133

# MAS Region

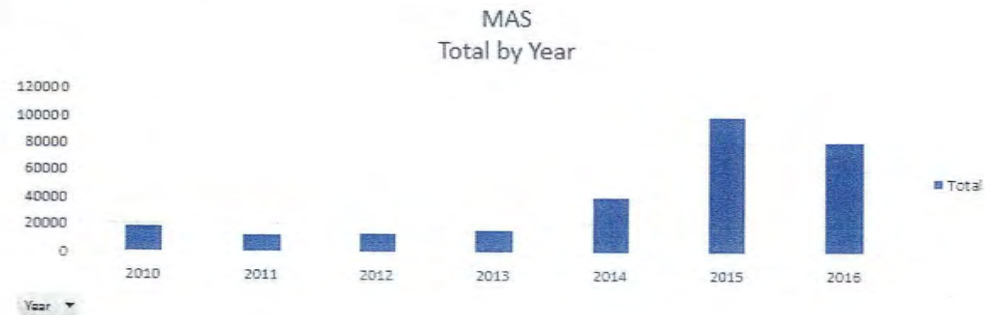
Dx\_Name (All) ▼

Row Labels ▼ Sum of Year

2010	18090
2011	12066
2012	14084
2013	16104
2014	40280
2015	98735
2016	80640
<b>Grand Total</b>	<b>279999</b>

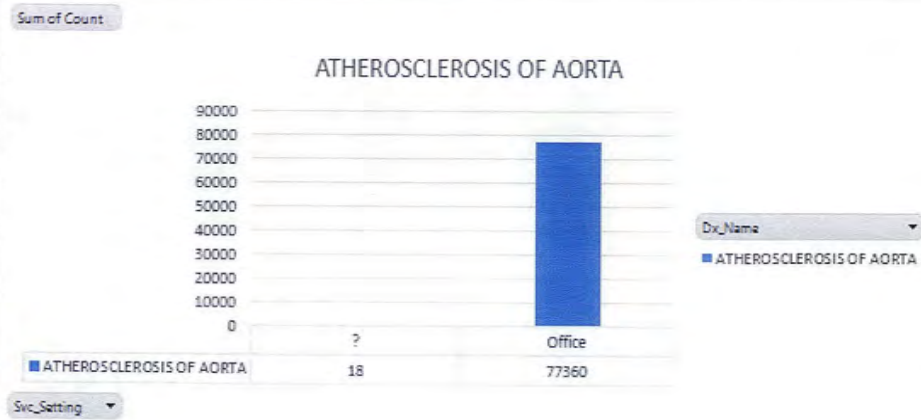
Dx\_Name ▼

Sum of Year



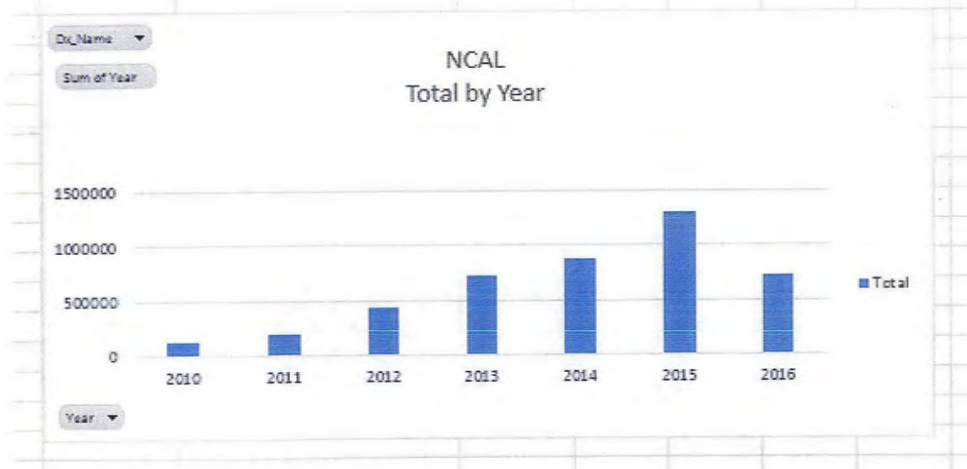
# MAS Region (cont.)

Sum of Count	Column Labels	
Row Labels	ATHEROSCLEROSIS OF AORTA	Grand Total
?	18	18
Office	77360	77360
<b>Grand Total</b>	<b>77378</b>	<b>77378</b>



# NCAL Region

Dx_Name	(All)
Row Labels	Sum of Year
2010	124620
2011	199089
2012	434592
2013	728706
2014	872062
2015	1301690
2016	725760
<b>Grand Total</b>	<b>4386519</b>



# NCAL Region

Dx\_Name (All) -

Row Labels Sum of Year

2010	124620
2011	199089
2012	434592
2013	728706
2014	872062
2015	1301690
2016	725760
<b>Grand Total</b>	<b>4386519</b>

Dx\_Name

Sum of Year

NCAL  
Total by Year



VH00137

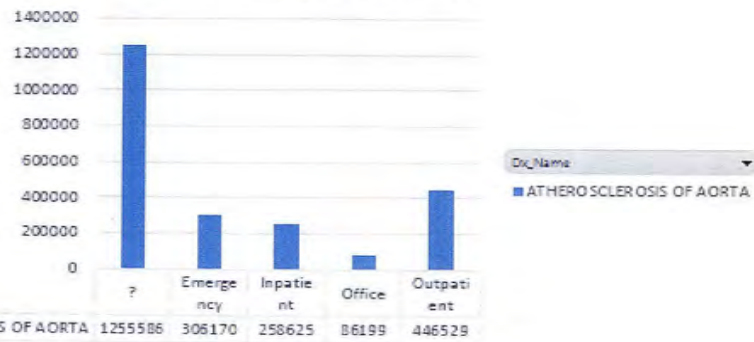
REL000242

# NCAL Region (cont.)

Sum of Count	Column Labels	
Row Labels	ATHEROSCLEROSIS OF AORTA	Grand Total
?	1255586	1255586
Emergency	306170	306170
Inpatient	258625	258625
Office	86199	86199
Outpatient	446529	446529
<b>Grand Total</b>	<b>2353109</b>	<b>2353109</b>

Sum of Count

ATHEROSCLEROSIS OF AORTA



ATHEROSCLEROSIS OF AORTA 1255586 306170 258625 86199 446529

Svc\_Setting

# NW Region

Dx_Name	(All)
Row Labels	Sum of Year
2010	68340
2011	72396
2012	62372
2013	116754
2014	213484
2015	336505
2016	247968
<b>Grand Total</b>	<b>1117819</b>



# NW Region

Dx\_Name (All) ▾

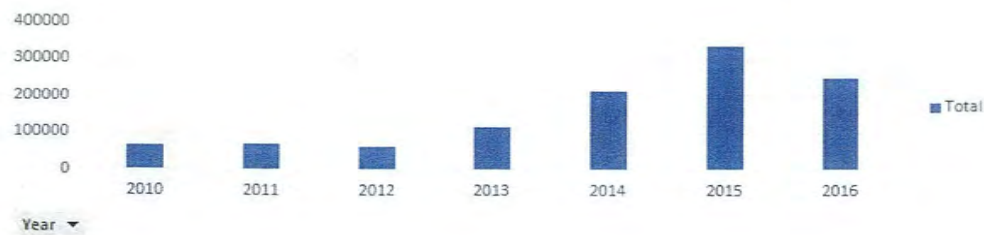
Row Labels ▾ Sum of Year

2010	68340
2011	72396
2012	62372
2013	116754
2014	213484
2015	336505
2016	247968
<b>Grand Total</b>	<b>1117819</b>

Dx\_Name ▾

Sum of Year

NW  
Total by Year



Year ▾

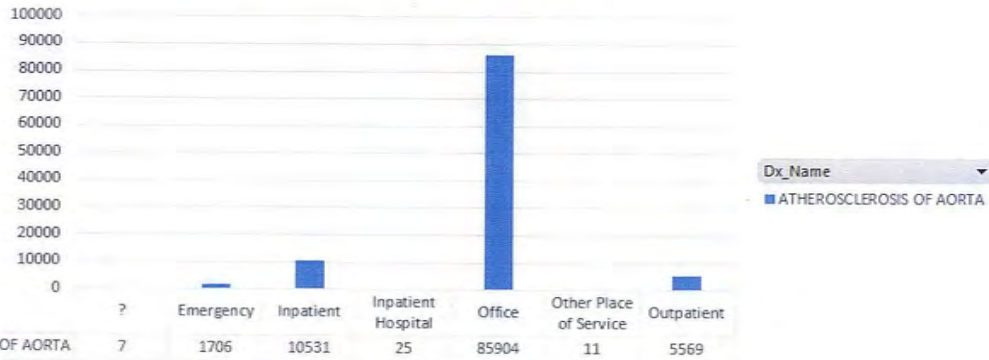
VH000140

# NW Region (cont.)

Sum of Count	Column Labels	Grand Total
Row Labels	ATHEROSCLEROSIS OF AORTA	
?	7	7
Emergency	1706	1706
Inpatient	10531	10531
Inpatient Hospital	25	25
Office	85904	85904
Other Place of Service	11	11
Outpatient	5569	5569
<b>Grand Total</b>	<b>103753</b>	<b>103753</b>

Sum of Count

ATHEROSCLEROSIS OF AORTA



# SCAL Region

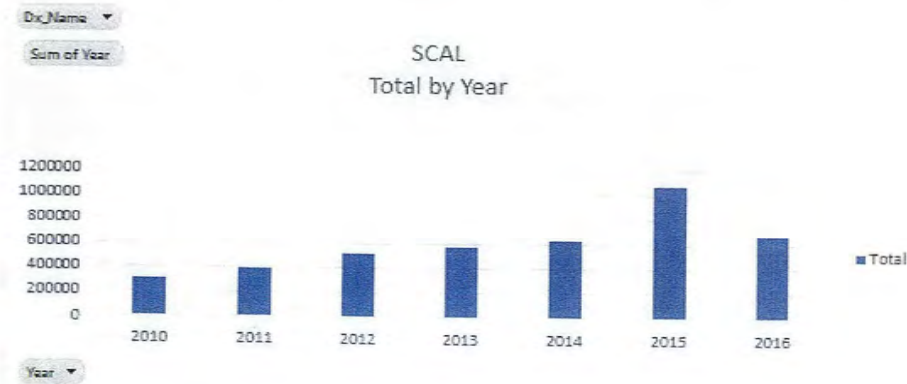
Dx_Name	(All)
<b>Row Labels</b>	<b>Sum of Year</b>
2010	313560
2011	394156
2012	525132
2013	579744
2014	636424
2015	1082055
2016	679392
<b>Grand Total</b>	<b>4210463</b>



# SCAL Region

Dx\_Name (All) ~

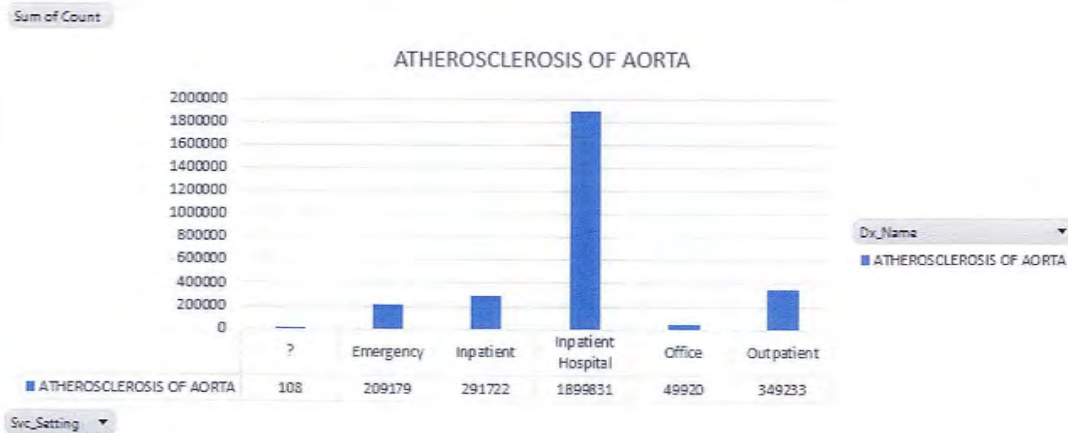
Row Labels	Sum of Year
2010	313560
2011	394156
2012	525132
2013	579744
2014	636424
2015	1082055
2016	679392
<b>Grand Total</b>	<b>4210463</b>



VH000143

# SCAL Region (cont.)

Sum of Count	Column Labels	
Row Labels	ATHEROSCLEROSIS OF AORTA Grand Total	
?	108	108
Emergency	209179	209179
Inpatient	291722	291722
Inpatient Hospit:	1899831	1899831
Office	49920	49920
Outpatient	349233	349233
<b>Grand Total</b>	<b>2799993</b>	<b>2799993</b>



# **EXHIBIT 18**

MA Regions HCC Rates and Weight (Part C - 2014 Model)  
As of May 21, 2016 extract

Select Region   
Select DOS Period

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk	Number of HCC's per Point
2,734	1.78	626.78	1,073,703	1,1189	29,540

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC1	HIV/AIDS	3,535	2,884	10,195	0.470	0.001	26.9	-
HCC2	Septicemia, Sepsis, Systemic Inflammatory Respo	4,024	23,543	94,736	0.535	0.012	219.3	-
HCC6	Opportunistic Infections	3,309	2,026	6,705	0.440	0.001	18.9	-
HCC8	Metastatic Cancer and Acute Leukemia	18,683	10,754	200,919	2.484	0.025	100.2	-
HCC9	Lung and Other Severe Cancers	7,318	6,081	44,503	0.973	0.006	56.6	-
HCC10	Lymphoma and Other Cancers	5,054	13,813	69,816	0.672	0.009	128.6	-
HCC11	Colorectal, Bladder, and Other Cancers	2,384	6,786	16,180	0.317	0.002	63.2	-
HCC12	Breast, Prostate, and Other Cancers and Tumors	1,158	37,088	42,959	0.154	0.005	345.4	-
HCC17	Diabetes with Acute Complications	2,768	888	2,458	0.368	0.000	8.3	-
HCC18	Diabetes with Chronic Complications	2,768	221,354	612,681	0.368	0.076	2061.6	-
HCC19	Diabetes without Complication	888	52,574	46,661	0.118	0.006	489.7	-
HCC21	Protein-Calorie Malnutrition	5,363	30,075	161,285	0.713	0.020	280.1	-
HCC22	Morbid Obesity	2,745	115,356	316,688	0.365	0.039	1074.4	New
HCC23	Other Significant Endocrine and Metabolic Disorde	1,843	37,033	68,242	0.245	0.008	344.9	New
HCC27	End-Stage Liver Disease	6,942	3,480	24,159	0.923	0.003	32.4	-
HCC28	Cirrhosis of Liver	3,001	5,022	15,071	0.399	0.002	46.8	-
HCC29	Chronic Hepatitis	1,888	9,683	18,280	0.251	0.002	90.2	-
HCC33	Intestinal Obstruction/Perforation	2,332	9,528	22,216	0.310	0.003	88.7	-
HCC34	Chronic Pancreatitis	2,151	1,767	3,801	0.286	0.000	16.5	-
HCC35	Inflammatory Bowel Disease	2,271	8,655	19,660	0.302	0.002	80.6	-
HCC39	Bone/Joint/Muscle Infections/Necrosis	3,746	5,036	18,863	0.498	0.002	46.9	-
HCC40	Rheumatoid Arthritis and Inflammatory Connective	2,813	46,534	130,900	0.374	0.016	433.4	-
HCC46	Severe Hematological Disorders	8,544	2,951	25,214	1.136	0.003	27.5	-
HCC47	Disorders of Immunity	3,919	7,555	29,605	0.521	0.004	70.4	-
HCC48	Coagulation Defects and Other Specified Hematolo	1,895	54,682	103,644	0.252	0.013	509.3	New
HCC54	Drug/Alcohol Psychosis	3,159	3,910	12,352	0.420	0.002	36.4	-
HCC55	Drug/Alcohol Dependence	3,159	19,587	61,875	0.420	0.008	182.4	-
HCC57	Schizophrenia	3,685	6,423	23,672	0.490	0.003	59.8	-
HCC58	Major Depressive, Bipolar, and Paranoid Disorders	2,482	153,809	381,764	0.330	0.047	1432.5	-
HCC70	Quadriplegia	9,281	1,074	9,968	1.234	0.001	10.0	-
HCC71	Paraplegia	7,913	1,890	14,955	1.052	0.002	17.6	-
HCC72	Spinal Cord Disorders/Injuries	3,828	4,108	15,727	0.509	0.002	38.3	-
HCC73	Amyotrophic Lateral Sclerosis and Other Motor Ne	7,206	457	3,293	0.958	0.000	4.3	-
HCC74	Cerebral Palsy	338	1,473	499	0.045	0.000	13.7	-
HCC75	Myasthenia Gravis/Myoneural Disorders and Guilla	3,069	6,004	18,425	0.408	0.002	55.9	-
HCC76	Muscular Dystrophy	4,250	472	2,006	0.565	0.000	4.4	-
HCC77	Multiple Sclerosis	4,182	4,449	18,605	0.556	0.002	41.4	-
HCC78	Parkinsons and Huntingtons Diseases	5,197	13,317	69,212	0.691	0.009	124.0	-
HCC79	Seizure Disorders and Convulsions	2,136	19,612	41,893	0.284	0.005	182.7	-
HCC80	Coma, Brain Compression/Anoxic Damage	4,287	2,080	8,917	0.570	0.001	19.4	-
HCC82	Respirator Dependence/Tracheostomy Status	11,433	1,379	15,765	1.520	0.002	12.8	-
HCC83	Respiratory Arrest	6,032	114	688	0.802	0.000	1.1	-
HCC84	Cardio-Respiratory Failure and Shock	2,475	32,316	79,967	0.329	0.010	301.0	-
HCC85	Congestive Heart Failure	2,768	86,946	240,656	0.368	0.030	809.8	-
HCC86	Acute Myocardial Infarction	2,068	6,917	14,307	0.275	0.002	64.4	-
HCC87	Unstable Angina and Other Acute Ischemic Heart t	1,941	8,006	15,536	0.258	0.002	74.6	-
HCC88	Angina Pectoris	1,061	44,593	47,292	0.141	0.006	415.3	-
HCC96	Specified Heart Arrhythmias	2,219	127,024	281,843	0.295	0.035	1183.0	-
HCC99	Cerebral Hemorrhage	2,550	3,038	7,746	0.339	0.001	28.3	-
HCC100	Ischemic or Unspecified Stroke	2,384	9,282	22,131	0.317	0.003	86.4	-
HCC103	Hemiplegia/Hemiparesis	4,370	19,795	86,503	0.581	0.011	184.4	-
HCC104	Monoplegia, Other Paralytic Syndromes	2,978	987	2,940	0.396	0.000	9.2	-
HCC106	Atherosclerosis of the Extremities with Ulceration o	10,628	1,581	16,802	1.413	0.002	14.7	-
HCC107	Vascular Disease with Complications	3,084	10,787	33,265	0.410	0.004	100.5	-
HCC108	Vascular Disease	2,249	352,963	793,778	0.299	0.098	3287.3	-
HCC110	Cystic Fibrosis	3,136	39	122	0.417	0.000	0.4	-
HCC111	Chronic Obstructive Pulmonary Disease	2,602	95,086	247,452	0.346	0.031	885.6	-
HCC112	Fibrosis of Lung and Other Chronic Lung Disorders	2,061	14,265	29,398	0.274	0.004	132.9	New
HCC114	Aspiration and Specified Bacterial Pneumonias	5,054	4,511	22,800	0.672	0.003	42.0	-
HCC115	Pneumococcal Pneumonia, Empyema, Lung Absco	1,504	1,814	2,729	0.200	0.000	16.9	-
HCC122	Proliferative Diabetic Retinopathy and Vitreous Hei	1,527	11,001	16,797	0.203	0.002	102.5	-
HCC124	Exudative Macular Degeneration	2,520	16,061	40,468	0.335	0.005	149.6	New
HCC134	Dialysis Status	3,580	2,042	7,311	0.476	0.001	19.0	-
HCC135	Acute Renal Failure	3,580	25,170	90,113	0.476	0.011	234.4	-
HCC136	Chronic Kidney Disease (Stage 5)	1,685	1,049	1,767	0.224	0.000	9.8	-
HCC137	Chronic Kidney Disease, Severe (Stage 4)	1,685	10,595	17,850	0.224	0.002	98.7	-
HCC157	Pressure Ulcer of Skin with Necrosis Through to M	18,713	629	11,771	2.488	0.001	5.9	-
HCC158	Pressure Ulcer of Skin with Full Thickness Skin Lo	10,064	2,003	20,157	1.338	0.002	18.7	-
HCC161	Chronic Ulcer of Skin, Except Pressure	4,031	13,825	55,735	0.536	0.007	128.8	-
HCC162	Severe Skin Burn or Condition	3,091	53	164	0.411	0.000	0.5	-
HCC166	Severe Head Injury	4,287	53	227	0.570	0.000	0.5	-
HCC167	Major Head Injury	1,226	4,355	5,339	0.163	0.001	40.6	-
HCC169	Vertebral Fractures without Spinal Cord Injury	3,738	8,587	32,099	0.497	0.004	80.0	-
HCC170	Hip Fracture/Dislocation	3,355	7,360	24,689	0.446	0.003	68.5	-
HCC173	Traumatic Amputations and Complications	1,993	2,595	5,172	0.265	0.001	24.2	-
HCC176	Complications of Specified Implanted Device or Gr	4,257	9,385	39,953	0.566	0.005	87.4	-
HCC186	Major Organ Transplant or Replacement Status	6,702	2,029	13,597	0.891	0.002	18.9	-
HCC188	Artificial Openings for Feeding or Elimination	4,896	8,457	41,409	0.651	0.005	78.8	-
HCC189	Amputation Status, Lower Limb/Amputation Compl	5,859	6,648	38,952	0.779	0.005	61.9	-
HCC190	Disabled, Opportunistic Infections	3,392	180	611	0.451	0.000	1.7	-
HCC191	Disabled, Chronic Pancreatitis	4,122	316	1,302	0.548	0.000	2.9	-
HCC192	Disabled, Severe Hematological Disorders	10,131	238	2,411	1.347	0.000	2.2	-
HCC193	Disabled, Drug/Alcohol Psychosis	2,490	969	2,412	0.331	0.000	9.0	-
HCC194	Disabled, Drug/Alcohol Dependence	0	4,863	0	0.000	0.000	45.3	-

**\_MA Regions HCC Rates and Weight (Part C - 2014 Model)**

As of May 21, 2016 extract

Select Region    
 Select DOS Period

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk Score	Number of HCC's per Point
2,734	1.78	626.78	1,073,703	1.1189	29,540

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC195	Disabled, Cystic Fibrosis	18,164	24	436	2.415	0.000	0.2	-
HCC196	Disabled, Complications of Specified Implanted De	3,783	798	3,019	0.503	0.000	7.4	-
HCC197	Cancer*Immune Disorders	7,123	2,904	20,685	0.947	0.003	27.0	-
HCC198	Congestive Heart Failure*Chronic Obstructive Puln	1,948	22,416	43,667	0.259	0.005	208.8	-
HCC199	Congestive Heart Failure*Renal Disease	2,384	15,382	36,675	0.317	0.005	143.3	-
HCC200	Chronic Obstructive Pulmonary Disease*Cardiores	3,430	18,157	62,274	0.456	0.008	169.1	-
HCC201	Diabetes*Congestive Heart Failure	1,369	36,767	50,330	0.182	0.006	342.4	-
HCC202	Sepsis*Cardiorespiratory Failure	1,610	7,798	12,552	0.214	0.002	72.6	-
HCC203	MALE, AGE 0-34	910	2,067	1,881	0.121	0.000	19.3	-
HCC204	MALE, AGE 35-44	933	3,068	2,861	0.124	0.000	28.6	-
HCC205	MALE, AGE 45-54	1,361	7,048	9,595	0.181	0.001	65.6	-
HCC206	MALE, AGE 55-59	2,023	7,056	14,276	0.269	0.002	65.7	-
HCC207	MALE, AGE 60-64	2,339	10,753	25,153	0.311	0.003	100.1	-
HCC208	MALE, AGE 65-69	2,166	117,575	254,687	0.288	0.032	1095.0	-
HCC209	MALE, AGE 70-74	2,678	122,214	327,243	0.356	0.041	1138.2	-
HCC210	MALE, AGE 75-79	3,324	89,424	297,287	0.442	0.037	832.9	-
HCC211	MALE, AGE 80-84	4,084	61,180	249,867	0.543	0.031	569.8	-
HCC212	MALE, AGE 85-89	5,137	32,234	165,590	0.683	0.021	300.2	-
HCC213	MALE, AGE 90-94	6,378	12,525	79,886	0.848	0.010	116.7	-
HCC214	MALE, AGE 95+	7,732	2,649	20,482	1.028	0.003	24.7	-
HCC215	FEMALE, AGE 0-34	1,482	1,810	2,682	0.197	0.000	16.9	-
HCC216	FEMALE, AGE 35-44	1,542	3,549	5,472	0.205	0.001	33.1	-
HCC217	FEMALE, AGE 45-54	1,978	8,234	16,288	0.263	0.002	76.7	-
HCC218	FEMALE, AGE 55-59	2,452	8,557	20,982	0.326	0.003	79.7	-
HCC219	FEMALE, AGE 60-64	2,948	12,688	37,409	0.392	0.005	118.2	-
HCC220	FEMALE, AGE 65-69	2,166	152,039	329,341	0.288	0.041	1416.0	-
HCC221	FEMALE, AGE 70-74	2,617	149,421	391,102	0.348	0.048	1391.6	-
HCC222	FEMALE, AGE 75-79	3,287	110,049	361,715	0.437	0.045	1024.9	-
HCC223	FEMALE, AGE 80-84	4,054	78,407	317,865	0.539	0.039	730.2	-
HCC224	FEMALE, AGE 85-89	5,092	49,406	251,575	0.677	0.031	460.1	-
HCC225	FEMALE, AGE 90-94	6,130	24,414	149,656	0.815	0.019	227.4	-
HCC226	FEMALE, AGE 95+	6,318	7,336	46,349	0.840	0.006	68.3	-
HCC227	MEDICAID FEMALE, DISABLED	639	14,550	9,302	0.085	0.001	135.5	-
HCC228	MEDICAID FEMALE, AGED	1,136	46,344	52,634	0.151	0.007	431.6	-
HCC229	MEDICAID MALE, DISABLED	647	11,513	7,447	0.086	0.001	107.2	-
HCC230	MEDICAID MALE, AGED	1,331	21,781	28,997	0.177	0.004	202.9	-
HCC231	ORIGINALLY-DISABLED FEMALE	1,798	37,252	66,965	0.239	0.008	346.9	-
HCC232	ORIGINALLY-DISABLED MALE	1,226	33,748	41,375	0.163	0.005	314.3	-

MA Regions HCC Rates and Weight (Part C - 2014 Model)  
As of May 21, 2016 extract

Select Region   
Select DOS Period

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk	Number of HCC's per Point
2,741	1.84	630.32	1,145,502	1,1391	31,616

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC1	HIV/AIDS	3,555	3,141	11,166	0.470	0.001	27.4	-
HCC2	Septicemia, Sepsis, Systemic Inflammatory Respo	4,047	26,066	105,481	0.535	0.012	227.6	-
HCC6	Opportunistic Infections	3,328	2,047	6,813	0.440	0.001	17.9	-
HCC8	Metastatic Cancer and Acute Leukemia	18,789	12,181	228,865	2.484	0.026	106.3	-
HCC9	Lung and Other Severe Cancers	7,360	6,653	48,964	0.973	0.006	58.1	-
HCC10	Lymphoma and Other Cancers	5,083	15,029	76,391	0.672	0.009	131.2	-
HCC11	Colorectal, Bladder, and Other Cancers	2,398	7,497	17,976	0.317	0.002	65.4	-
HCC12	Breast, Prostate, and Other Cancers and Tumors	1,165	41,466	48,301	0.154	0.006	362.0	-
HCC17	Diabetes with Acute Complications	2,784	1,010	2,811	0.368	0.000	8.8	-
HCC18	Diabetes with Chronic Complications	2,784	241,900	673,331	0.368	0.078	2111.7	-
HCC19	Diabetes without Complication	893	56,817	50,711	0.118	0.006	496.0	-
HCC21	Protein-Calorie Malnutrition	5,393	30,270	163,248	0.713	0.019	264.3	-
HCC22	Morbid Obesity	2,761	128,921	355,927	0.365	0.041	1125.5	New
HCC23	Other Significant Endocrine and Metabolic Disorde	1,853	43,339	80,314	0.245	0.009	378.3	New
HCC27	End-Stage Liver Disease	6,981	3,940	27,507	0.923	0.003	34.4	-
HCC28	Cirrhosis of Liver	3,018	5,844	17,637	0.399	0.002	51.0	-
HCC29	Chronic Hepatitis	1,899	10,622	20,166	0.251	0.002	92.7	-
HCC33	Intestinal Obstruction/Perforation	2,345	9,531	22,348	0.310	0.003	83.2	-
HCC34	Chronic Pancreatitis	2,163	2,007	4,342	0.286	0.001	17.5	-
HCC35	Inflammatory Bowel Disease	2,284	9,323	21,296	0.302	0.002	81.4	-
HCC39	Bone/Joint/Muscle Infections/Necrosis	3,767	5,368	20,220	0.498	0.002	46.9	-
HCC40	Rheumatoid Arthritis and Inflammatory Connective	2,829	52,648	148,936	0.374	0.017	459.6	-
HCC46	Severe Hematological Disorders	8,593	3,011	25,872	1.136	0.003	26.3	-
HCC47	Disorders of Immunity	3,941	9,586	37,776	0.521	0.004	83.7	-
HCC48	Coagulation Defects and Other Specified Hematolo	1,906	66,396	126,557	0.252	0.015	579.6	New
HCC54	Drug/Alcohol Psychosis	3,177	3,194	10,147	0.420	0.001	27.9	-
HCC55	Drug/Alcohol Dependence	3,177	20,333	64,595	0.420	0.007	177.5	-
HCC57	Schizophrenia	3,706	6,922	25,655	0.490	0.003	60.4	-
HCC58	Major Depressive, Bipolar, and Paranoid Disorders	2,496	165,695	413,588	0.330	0.048	1446.5	-
HCC70	Quadriplegia	9,334	1,145	10,687	1.234	0.001	10.0	-
HCC71	Paraplegia	7,957	2,013	16,018	1.052	0.002	17.6	-
HCC72	Spinal Cord Disorders/Injuries	3,850	4,414	16,994	0.509	0.002	38.5	-
HCC73	Amyotrophic Lateral Sclerosis and Other Motor Ne	7,246	501	3,630	0.958	0.000	4.4	-
HCC74	Cerebral Palsy	340	1,625	553	0.045	0.000	14.2	-
HCC75	Myasthenia Gravis/Myoneural Disorders and Guilla	3,086	5,952	18,368	0.408	0.002	52.0	-
HCC76	Muscular Dystrophy	4,274	484	2,068	0.565	0.000	4.2	-
HCC77	Multiple Sclerosis	4,206	4,686	19,707	0.556	0.002	40.9	-
HCC78	Parkinsons and Huntingtons Diseases	5,227	14,223	74,339	0.691	0.009	124.2	-
HCC79	Seizure Disorders and Convulsions	2,148	21,059	45,238	0.284	0.005	183.8	-
HCC80	Coma, Brain Compression/Anoxic Damage	4,311	2,388	10,296	0.570	0.001	20.8	-
HCC82	Respirator Dependence/Tracheostomy Status	11,497	1,355	15,579	1.520	0.002	11.8	-
HCC83	Respiratory Arrest	6,066	122	740	0.802	0.000	1.1	-
HCC84	Cardio-Respiratory Failure and Shock	2,489	36,388	90,552	0.329	0.010	317.7	-
HCC85	Congestive Heart Failure	2,784	91,763	255,423	0.368	0.029	801.1	-
HCC86	Acute Myocardial Infarction	2,080	7,894	16,420	0.275	0.002	68.9	-
HCC87	Unstable Angina and Other Acute Ischemic Heart t	1,951	9,340	18,227	0.258	0.002	81.5	-
HCC88	Angina Pectoris	1,067	44,088	47,020	0.141	0.005	384.9	-
HCC96	Specified Heart Arrhythmias	2,231	135,963	303,381	0.295	0.035	1186.9	-
HCC99	Cerebral Hemorrhage	2,564	3,479	8,921	0.339	0.001	30.4	-
HCC100	Ischemic or Unspecified Stroke	2,398	9,971	23,908	0.317	0.003	87.0	-
HCC103	Hemiplegia/Hemiparesis	4,395	20,859	91,667	0.581	0.011	182.1	-
HCC104	Monoplegia, Other Paralytic Syndromes	2,995	1,084	3,247	0.396	0.000	9.5	-
HCC106	Atherosclerosis of the Extremities with Ulceration o	10,688	1,675	17,902	1.413	0.002	14.6	-
HCC107	Vascular Disease with Complications	3,101	11,884	36,855	0.410	0.004	103.7	-
HCC108	Vascular Disease	2,262	412,566	933,060	0.299	0.108	3601.6	-
HCC110	Cystic Fibrosis	3,154	46	145	0.417	0.000	0.4	-
HCC111	Chronic Obstructive Pulmonary Disease	2,617	100,093	261,954	0.346	0.030	873.8	-
HCC112	Fibrosis of Lung and Other Chronic Lung Disorders	2,073	16,664	34,536	0.274	0.004	145.5	New
HCC114	Aspiration and Specified Bacterial Pneumonias	5,083	4,883	24,820	0.672	0.003	42.6	-
HCC115	Pneumococcal Pneumonia, Empyema, Lung Absco	1,513	2,033	3,075	0.200	0.000	17.7	-
HCC122	Proliferative Diabetic Retinopathy and Vitreous Hei	1,535	11,313	17,371	0.203	0.002	98.8	-
HCC124	Exudative Macular Degeneration	2,534	18,479	46,824	0.335	0.005	161.3	New
HCC134	Dialysis Status	3,600	2,034	7,323	0.476	0.001	17.8	-
HCC135	Acute Renal Failure	3,600	27,755	99,929	0.476	0.012	242.3	-
HCC136	Chronic Kidney Disease (Stage 5)	1,694	1,052	1,782	0.224	0.000	9.2	-
HCC137	Chronic Kidney Disease, Severe (Stage 4)	1,694	10,793	18,287	0.224	0.002	94.2	-
HCC157	Pressure Ulcer of Skin with Necrosis Through to M	18,819	712	13,399	2.488	0.002	6.2	-
HCC158	Pressure Ulcer of Skin with Full Thickness Skin Lo	10,120	2,127	21,526	1.338	0.002	18.6	-
HCC161	Chronic Ulcer of Skin, Except Pressure	4,054	15,048	61,008	0.536	0.007	131.4	-
HCC162	Severe Skin Burn or Condition	3,109	75	233	0.411	0.000	0.7	-
HCC166	Severe Head Injury	4,311	48	207	0.570	0.000	0.4	-
HCC167	Major Head Injury	1,233	4,709	5,806	0.163	0.001	41.1	-
HCC169	Vertebral Fractures without Spinal Cord Injury	3,759	8,385	31,521	0.497	0.004	73.2	-
HCC170	Hip Fracture/Dislocation	3,373	7,781	26,249	0.446	0.003	67.9	-
HCC173	Traumatic Amputations and Complications	2,004	2,648	5,308	0.265	0.001	23.1	-
HCC176	Complications of Specified Implanted Device or Gr	4,281	9,722	41,621	0.566	0.005	84.9	-
HCC186	Major Organ Transplant or Replacement Status	6,739	2,328	15,689	0.891	0.002	20.3	-
HCC188	Artificial Openings for Feeding or Elimination	4,924	8,842	43,539	0.651	0.005	77.2	-
HCC189	Amputation Status, Lower Limb/Amputation Compl	5,892	7,057	41,582	0.779	0.005	61.6	-
HCC190	Disabled, Opportunistic Infections	3,411	187	638	0.451	0.000	1.6	-
HCC191	Disabled, Chronic Pancreatitis	4,145	373	1,546	0.548	0.000	3.3	-
HCC192	Disabled, Severe Hematological Disorders	10,189	250	2,547	1.347	0.000	2.2	-
HCC193	Disabled, Drug/Alcohol Psychosis	2,504	889	2,226	0.331	0.000	7.8	-
HCC194	Disabled, Drug/Alcohol Dependence	0	4,979	0	0.000	0.000	43.5	-

**\_MA Regions HCC Rates and Weight (Part C - 2014 Model)**

As of May 21, 2016 extract

Select Region    
 Select DOS Period

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk Score	Number of HCC's per Point
2,741	1.84	630.32	1,145,502	1.1391	31,616

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC195	Disabled, Cystic Fibrosis	18,267	26	475	2.415	0.000	0.2	-
HCC196	Disabled, Complications of Specified Implanted De	3,805	848	3,226	0.503	0.000	7.4	-
HCC197	Cancer*Immune Disorders	7,163	3,833	27,456	0.947	0.003	33.5	-
HCC198	Congestive Heart Failure*Chronic Obstructive Pulm	1,959	23,374	45,791	0.259	0.005	204.1	-
HCC199	Congestive Heart Failure*Renal Disease	2,398	16,502	39,568	0.317	0.005	144.1	-
HCC200	Chronic Obstructive Pulmonary Disease*Cardiores	3,449	19,839	68,427	0.456	0.008	173.2	-
HCC201	Diabetes*Congestive Heart Failure	1,377	39,468	54,333	0.182	0.006	344.5	-
HCC202	Sepsis*Cardiorespiratory Failure	1,619	9,201	14,893	0.214	0.002	80.3	-
HCC203	MALE, AGE 0-34	915	2,193	2,007	0.121	0.000	19.1	-
HCC204	MALE, AGE 35-44	938	3,301	3,096	0.124	0.000	28.8	-
HCC205	MALE, AGE 45-54	1,369	7,395	10,124	0.181	0.001	64.6	-
HCC206	MALE, AGE 55-59	2,035	7,481	15,221	0.269	0.002	65.3	-
HCC207	MALE, AGE 60-64	2,352	11,622	27,339	0.311	0.003	101.5	-
HCC208	MALE, AGE 65-69	2,178	128,744	280,456	0.288	0.032	1123.9	-
HCC209	MALE, AGE 70-74	2,693	130,474	351,333	0.356	0.041	1139.0	-
HCC210	MALE, AGE 75-79	3,343	94,174	314,846	0.442	0.036	822.1	-
HCC211	MALE, AGE 80-84	4,107	63,841	262,207	0.543	0.030	557.3	-
HCC212	MALE, AGE 85-89	5,166	34,721	179,373	0.683	0.021	303.1	-
HCC213	MALE, AGE 90-94	6,414	13,148	84,334	0.848	0.010	114.8	-
HCC214	MALE, AGE 95+	7,776	2,952	22,954	1.028	0.003	25.8	-
HCC215	FEMALE, AGE 0-34	1,490	1,890	2,816	0.197	0.000	16.5	-
HCC216	FEMALE, AGE 35-44	1,551	3,757	5,826	0.205	0.001	32.8	-
HCC217	FEMALE, AGE 45-54	1,989	8,443	16,796	0.263	0.002	73.7	-
HCC218	FEMALE, AGE 55-59	2,466	9,121	22,491	0.326	0.003	79.6	-
HCC219	FEMALE, AGE 60-64	2,965	13,856	41,084	0.392	0.005	121.0	-
HCC220	FEMALE, AGE 65-69	2,178	166,109	361,852	0.288	0.042	1450.1	-
HCC221	FEMALE, AGE 70-74	2,632	160,083	421,376	0.348	0.049	1397.5	-
HCC222	FEMALE, AGE 75-79	3,305	115,179	380,715	0.437	0.044	1005.5	-
HCC223	FEMALE, AGE 80-84	4,077	81,829	333,611	0.539	0.039	714.4	-
HCC224	FEMALE, AGE 85-89	5,121	51,455	263,488	0.677	0.030	449.2	-
HCC225	FEMALE, AGE 90-94	6,165	25,647	158,103	0.815	0.018	223.9	-
HCC226	FEMALE, AGE 95+	6,354	8,087	51,382	0.840	0.006	70.6	-
HCC227	MEDICAID FEMALE, DISABLED	643	16,731	10,757	0.085	0.001	146.1	-
HCC228	MEDICAID FEMALE, AGED	1,142	53,521	61,129	0.151	0.007	467.2	-
HCC229	MEDICAID MALE, DISABLED	650	13,316	8,662	0.086	0.001	116.2	-
HCC230	MEDICAID MALE, AGED	1,339	26,758	35,824	0.177	0.004	233.6	-
HCC231	ORIGINALLY-DISABLED FEMALE	1,808	40,466	73,153	0.239	0.008	353.3	-
HCC232	ORIGINALLY-DISABLED MALE	1,233	36,611	45,138	0.163	0.005	319.6	-

MA Regions HCC Rates and Weight (Part C - 2014 Model)  
As of May 21, 2016 extract

Select Region   
Select DOS Period

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk Score	Number of HCC's per Point
2,721	1.19	630.32	1,261,910	0.8902	35,083

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC1	HIV/AIDS	3,555	2,847	10,121	0.470	0.001	22.6	-
HCC2	Septicemia, Sepsis, Systemic Inflammatory Respo	4,047	10,976	44,416	0.535	0.005	87.0	-
HCC6	Opportunistic Infections	3,328	1,317	4,383	0.440	0.000	10.4	-
HCC8	Metastatic Cancer and Acute Leukemia	18,789	10,615	199,442	2.484	0.021	84.1	-
HCC9	Lung and Other Severe Cancers	7,360	5,827	42,885	0.973	0.004	46.2	-
HCC10	Lymphoma and Other Cancers	5,083	12,394	62,998	0.672	0.007	98.2	-
HCC11	Colorectal, Bladder, and Other Cancers	2,398	5,233	12,547	0.317	0.001	41.5	-
HCC12	Breast, Prostate, and Other Cancers and Tumors	1,165	30,239	35,224	0.154	0.004	239.6	-
HCC17	Diabetes with Acute Complications	2,784	411	1,144	0.368	0.000	3.3	-
HCC18	Diabetes with Chronic Complications	2,784	183,688	511,297	0.368	0.054	1455.6	-
HCC19	Diabetes without Complication	893	53,322	47,592	0.118	0.005	422.5	-
HCC21	Protein-Calorie Malnutrition	5,393	18,117	97,706	0.713	0.010	143.6	-
HCC22	Morbid Obesity	2,761	91,016	251,279	0.365	0.026	721.3	New
HCC23	Other Significant Endocrine and Metabolic Disorde	1,853	32,654	60,513	0.245	0.006	258.8	New
HCC27	End-Stage Liver Disease	6,981	2,859	19,960	0.923	0.002	22.7	-
HCC28	Cirrhosis of Liver	3,018	4,859	14,664	0.399	0.002	38.5	-
HCC29	Chronic Hepatitis	1,899	7,965	15,122	0.251	0.002	63.1	-
HCC33	Intestinal Obstruction/Perforation	2,345	3,544	8,310	0.310	0.001	28.1	-
HCC34	Chronic Pancreatitis	2,163	1,394	3,016	0.286	0.000	11.0	-
HCC35	Inflammatory Bowel Disease	2,284	6,710	15,328	0.302	0.002	53.2	-
HCC39	Bone/Joint/Muscle Infections/Necrosis	3,767	2,887	10,875	0.498	0.001	22.9	-
HCC40	Rheumatoid Arthritis and Inflammatory Connective	2,829	34,479	97,537	0.374	0.010	273.2	-
HCC46	Severe Hematological Disorders	8,593	2,166	18,612	1.136	0.002	17.2	-
HCC47	Disorders of Immunity	3,941	5,963	23,499	0.521	0.002	47.3	-
HCC48	Coagulation Defects and Other Specified Hematolo	1,906	44,530	84,879	0.252	0.009	352.9	New
HCC54	Drug/Alcohol Psychosis	3,177	306	972	0.420	0.000	2.4	-
HCC55	Drug/Alcohol Dependence	3,177	13,568	43,103	0.420	0.005	107.5	-
HCC57	Schizophrenia	3,706	5,535	20,514	0.490	0.002	43.9	-
HCC58	Major Depressive, Bipolar, and Paranoid Disorders	2,496	122,121	304,824	0.330	0.032	967.7	-
HCC70	Quadriplegia	9,334	767	7,159	1.234	0.001	6.1	-
HCC71	Paraplegia	7,957	1,413	11,244	1.052	0.001	11.2	-
HCC72	Spinal Cord Disorders/Injuries	3,850	2,990	11,512	0.509	0.001	23.7	-
HCC73	Amyotrophic Lateral Sclerosis and Other Motor Ne	7,246	402	2,913	0.958	0.000	3.2	-
HCC74	Cerebral Palsy	340	1,106	376	0.045	0.000	8.8	-
HCC75	Myasthenia Gravis/Myoneural Disorders and Guilla	3,086	4,534	13,992	0.408	0.001	35.9	-
HCC76	Muscular Dystrophy	4,274	341	1,457	0.565	0.000	2.7	-
HCC77	Multiple Sclerosis	4,206	3,450	14,509	0.556	0.002	27.3	-
HCC78	Parkinsons and Huntingtons Diseases	5,227	11,594	60,598	0.691	0.006	91.9	-
HCC79	Seizure Disorders and Convulsions	2,148	14,636	31,440	0.284	0.003	116.0	-
HCC80	Coma, Brain Compression/Anoxic Damage	4,311	1,085	4,678	0.570	0.000	8.6	-
HCC82	Respirator Dependence/Tracheostomy Status	11,497	804	9,244	1.520	0.001	6.4	-
HCC83	Respiratory Arrest	6,066	37	224	0.802	0.000	0.3	-
HCC84	Cardio-Respiratory Failure and Shock	2,489	22,875	56,925	0.329	0.006	181.3	-
HCC85	Congestive Heart Failure	2,784	68,087	189,521	0.368	0.020	539.6	-
HCC86	Acute Myocardial Infarction	2,080	3,271	6,804	0.275	0.001	25.9	-
HCC87	Unstable Angina and Other Acute Ischemic Heart t	1,951	3,934	7,677	0.258	0.001	31.2	-
HCC88	Angina Pectoris	1,067	31,168	33,241	0.141	0.003	247.0	-
HCC96	Specified Heart Arrhythmias	2,231	101,966	227,521	0.295	0.024	808.0	-
HCC99	Cerebral Hemorrhage	2,564	1,422	3,646	0.339	0.000	11.3	-
HCC100	Ischemic or Unspecified Stroke	2,398	4,394	10,536	0.317	0.001	34.8	-
HCC103	Hemiplegia/Hemiparesis	4,395	14,708	64,636	0.581	0.007	116.6	-
HCC104	Monoplegia, Other Paralytic Syndromes	2,995	656	1,965	0.396	0.000	5.2	-
HCC106	Atherosclerosis of the Extremities with Ulceration o	10,688	975	10,421	1.413	0.001	7.7	-
HCC107	Vascular Disease with Complications	3,101	6,253	19,392	0.410	0.002	49.6	-
HCC108	Vascular Disease	2,262	304,447	688,538	0.299	0.072	2412.6	-
HCC110	Cystic Fibrosis	3,154	35	110	0.417	0.000	0.3	-
HCC111	Chronic Obstructive Pulmonary Disease	2,617	72,568	189,918	0.346	0.020	575.1	-
HCC112	Fibrosis of Lung and Other Chronic Lung Disorders	2,073	12,114	25,106	0.274	0.003	96.0	New
HCC114	Aspiration and Specified Bacterial Pneumonias	5,083	2,085	10,598	0.672	0.001	16.5	-
HCC115	Pneumococcal Pneumonia, Empyema, Lung Absco	1,513	1,026	1,552	0.200	0.000	8.1	-
HCC122	Proliferative Diabetic Retinopathy and Vitreous Hei	1,535	8,094	12,428	0.203	0.001	64.1	-
HCC124	Exudative Macular Degeneration	2,534	15,695	39,770	0.335	0.004	124.4	New
HCC134	Dialysis Status	3,600	1,585	5,707	0.476	0.001	12.6	-
HCC135	Acute Renal Failure	3,600	12,369	44,533	0.476	0.005	98.0	-
HCC136	Chronic Kidney Disease (Stage 5)	1,694	907	1,537	0.224	0.000	7.2	-
HCC137	Chronic Kidney Disease, Severe (Stage 4)	1,694	9,440	15,994	0.224	0.002	74.8	-
HCC157	Pressure Ulcer of Skin with Necrosis Through to M	18,819	429	8,073	2.488	0.001	3.4	-
HCC158	Pressure Ulcer of Skin with Full Thickness Skin Lo	10,120	1,118	11,315	1.338	0.001	8.9	-
HCC161	Chronic Ulcer of Skin, Except Pressure	4,054	8,709	35,308	0.536	0.004	69.0	-
HCC162	Severe Skin Burn or Condition	3,109	48	149	0.411	0.000	0.4	-
HCC166	Severe Head Injury	4,311	5	22	0.570	0.000	0.0	-
HCC167	Major Head Injury	1,233	1,806	2,227	0.163	0.000	14.3	-
HCC169	Vertebral Fractures without Spinal Cord Injury	3,759	2,645	9,943	0.497	0.001	21.0	-
HCC170	Hip Fracture/Dislocation	3,373	2,777	9,368	0.446	0.001	22.0	-
HCC173	Traumatic Amputations and Complications	2,004	463	928	0.265	0.000	3.7	-
HCC176	Complications of Specified Implanted Device or Gr	4,281	3,744	16,029	0.566	0.002	29.7	-
HCC186	Major Organ Transplant or Replacement Status	6,739	2,081	14,025	0.891	0.001	16.5	-
HCC188	Artificial Openings for Feeding or Elimination	4,924	6,094	30,007	0.651	0.003	48.3	-
HCC189	Amputation Status, Lower Limb/Amputation Compl	5,892	5,728	33,751	0.779	0.004	45.4	-
HCC190	Disabled, Opportunistic Infections	3,411	93	317	0.451	0.000	0.7	-
HCC191	Disabled, Chronic Pancreatitis	4,145	254	1,053	0.548	0.000	2.0	-
HCC192	Disabled, Severe Hematological Disorders	10,189	176	1,793	1.347	0.000	1.4	-
HCC193	Disabled, Drug/Alcohol Psychosis	2,504	67	168	0.331	0.000	0.5	-
HCC194	Disabled, Drug/Alcohol Dependence	0	3,519	0	0.000	0.000	27.9	-

**\_MA Regions HCC Rates and Weight (Part C - 2014 Model)**

As of May 21, 2016 extract

Select Region

\_MA Regions ▼

Select DOS Period

YTD 2016-04 ▼

Average \$\$ per HCC	Average HCC per Member	PMPM Rate for Risk Score of 1.0	Continuous KP MA Members	Total Risk Score	Number of HCC's per Point
2,721	1.19	630.32	1,261,910	0.8902	35,083

Condition Category	Description	Impact on Revenues			Impact on Score			New HCC for PY2014?
		Annual \$ Weights	Number of Unique Cases	Estimated Revenue Contribution	HCC Coefficient	Risk Score Contribution	Number of Cases per 10K Members	
HCC195	Disabled, Cystic Fibrosis	18,267	24	438	2.415	0.000	0.2	-
HCC196	Disabled, Complications of Specified Implanted De	3,805	326	1,240	0.503	0.000	2.6	-
HCC197	Cancer*Immune Disorders	7,163	2,356	16,876	0.947	0.002	18.7	-
HCC198	Congestive Heart Failure*Chronic Obstructive Puln	1,959	16,356	32,042	0.259	0.003	129.6	-
HCC199	Congestive Heart Failure*Renal Disease	2,398	9,249	22,177	0.317	0.002	73.3	-
HCC200	Chronic Obstructive Pulmonary Disease*Cardiores	3,449	12,845	44,304	0.456	0.005	101.8	-
HCC201	Diabetes*Congestive Heart Failure	1,377	29,454	40,547	0.182	0.004	233.4	-
HCC202	Sepsis*Cardiorespiratory Failure	1,619	3,900	6,313	0.214	0.001	30.9	-
HCC203	MALE, AGE 0-34	915	2,379	2,177	0.121	0.000	18.9	-
HCC204	MALE, AGE 35-44	938	3,650	3,423	0.124	0.000	28.9	-
HCC205	MALE, AGE 45-54	1,369	7,695	10,535	0.181	0.001	61.0	-
HCC206	MALE, AGE 55-59	2,035	7,988	16,253	0.269	0.002	63.3	-
HCC207	MALE, AGE 60-64	2,352	12,669	29,802	0.311	0.003	100.4	-
HCC208	MALE, AGE 65-69	2,178	139,532	303,956	0.288	0.032	1105.7	-
HCC209	MALE, AGE 70-74	2,693	148,672	400,336	0.356	0.042	1178.2	-
HCC210	MALE, AGE 75-79	3,343	101,553	339,516	0.442	0.036	804.8	-
HCC211	MALE, AGE 80-84	4,107	69,296	284,612	0.543	0.030	549.1	-
HCC212	MALE, AGE 85-89	5,166	39,355	203,313	0.683	0.021	311.9	-
HCC213	MALE, AGE 90-94	6,414	15,474	99,253	0.848	0.010	122.6	-
HCC214	MALE, AGE 95+	7,776	4,004	31,134	1.028	0.003	31.7	-
HCC215	FEMALE, AGE 0-34	1,490	2,013	3,000	0.197	0.000	16.0	-
HCC216	FEMALE, AGE 35-44	1,551	4,062	6,299	0.205	0.001	32.2	-
HCC217	FEMALE, AGE 45-54	1,989	8,877	17,659	0.263	0.002	70.3	-
HCC218	FEMALE, AGE 55-59	2,466	9,681	23,872	0.326	0.003	76.7	-
HCC219	FEMALE, AGE 60-64	2,965	14,942	44,304	0.392	0.005	118.4	-
HCC220	FEMALE, AGE 65-69	2,178	179,082	390,112	0.288	0.041	1419.1	-
HCC221	FEMALE, AGE 70-74	2,632	182,151	479,464	0.348	0.050	1443.5	-
HCC222	FEMALE, AGE 75-79	3,305	124,097	410,192	0.437	0.043	983.4	-
HCC223	FEMALE, AGE 80-84	4,077	88,683	361,555	0.539	0.038	702.8	-
HCC224	FEMALE, AGE 85-89	5,121	56,493	289,287	0.677	0.030	447.7	-
HCC225	FEMALE, AGE 90-94	6,165	29,164	179,783	0.815	0.019	231.1	-
HCC226	FEMALE, AGE 95+	6,354	10,398	66,065	0.840	0.007	82.4	-
HCC227	MEDICAID FEMALE, DISABLED	643	18,275	11,750	0.085	0.001	144.8	-
HCC228	MEDICAID FEMALE, AGED	1,142	59,580	68,049	0.151	0.007	472.1	-
HCC229	MEDICAID MALE, DISABLED	650	14,587	9,489	0.086	0.001	115.6	-
HCC230	MEDICAID MALE, AGED	1,339	30,780	41,209	0.177	0.004	243.9	-
HCC231	ORIGINALLY-DISABLED FEMALE	1,808	45,228	81,762	0.239	0.009	358.4	-
HCC232	ORIGINALLY-DISABLED MALE	1,233	40,941	50,477	0.163	0.005	324.4	-

# **EXHIBIT 19**

Central Office on  
**ICD-9-CM**

American Hospital Association  
155 N. Wacker Drive, Suite 400  
Chicago, IL 60606-1725  
312-422-3366  
312-278-0838

February 7, 2014

Gloryanne Bryant  
Regional Director  
HIM  
Kaiser Permanente  
1800 Harrison St., #24  
Oakland, CA 94612

Dear Ms. Bryant,

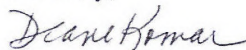
This letter is in response to your request for clarification regarding status code assignment for a newborn on a ventilator.

Code V46.11, Dependence on respirator status, implies long-term use of a ventilator and should only be applied when the patient requires continued ventilator support. While there is no time frame set on what constitutes ventilator dependency, this code should be reported when the patient requires continued ventilator support for an unexpected extended period of time and not for the short-term acute phase of a condition. Therefore, it is not used for newborns who are placed on a vent for a short period.

Unfortunately due to a code set freeze in preparation for ICD-10-CM/PCS implementation, there will be no changes to the official coding guidelines, as well as revisions to the ICD-9-CM diagnosis codes or changes to the Index to Diseases.

I trust this information will be of assistance to you.

Sincerely,



Diane Komar, RHIT  
Coding Consultant

Ref. #50003482.1213

AHA CENTRAL OFFICE™

An American Hospital Association Service



This coding information is being provided specifically to you based on the facts and details you provided. The American Hospital Association has used its best efforts to provide accurate coding advice, but this advice should not be construed as providing clinical advice, dictating reimbursement policy, or a substitution for the judgment of a practitioner. This information is provided for individual reference only. Any reprint or distribution of all or part of this correspondence, without the express written consent of the American Hospital Association's Central Office on ICD-9-CM, is strictly prohibited.

# **EXHIBIT 20**

**1) Lindy Petersen sent an email on 10/24 to review some cases on a TPMG HCC audit in preparation for Covered California.**

From: Lindy A Petersen/CA/KAIPERM  
To: Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Cc: Marcus Lee/CA/KAIPERM, Hans Eric Tan/CA/KAIPERM  
Date: 10/24/2013 04:24 PM  
Subject: Interesting Findings for V46.11 & V46.13

Hi Victoria,

I wanted to give you a heads up on a project my team has been working on. In preparation for Covered California, my team audited infant stays longer than 6 days in 2012. We had some interesting findings in regards to HSS-HCC 125 - Respirator Dependence/ Tracheostomy Status (V46.11 & V46.13). While reviewing the charts, the auditors noticed documentation of the infant being on a ventilator for several days. In these cases the V-codes were not captured by the physician or HIM coder. I am providing you with a list of MRNs for your review. I am curious to know if these are missed opportunities, or if there is a specific reason for not capturing the codes.

Marcus Lee will be meeting with Rod Madamba on Monday, 11/4/13 to discuss our findings. I would greatly appreciate your expert opinion on these encounters.

[attachment "V4611\_V4613 Findings.xlsx" deleted by Lindy A Petersen/CA/KAIPERM]

Thank you and have a wonderful day.

Lindy Petersen, CPC, CCS  
AHIMA Approved ICD-10-CM/PCS Trainer  
Manager, Auditing and Coding Services  
The Permanente Medical Group, Inc.  
Encounter Information Operations  
1950 Franklin St., 7th Floor  
(510) 987-4963 / 8-427-4963  
Cell (510) 418-7250  
Lindy.A.Petersen@KP.org

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**2) On 11/4 @ 3 pm, Rod Madamba asked me and Dawna Toews to join the meeting with TPMG (primary discussion was regarding V46.11, Mechanical Ventilation Dependence Status and V46.13, Encounter for weaning from ventilator on newborn cases). Attendees were Rod**

**Madamba, Dawna Toews, Marcus Lee, Hans Eric Tan and Victoria Hernandez. I gave feedback that V46.13 would not be appropriate for initial newborn hospital visits because this code is for principal diagnosis assignment for the specific purpose of weaning the patient from the ventilator (as reason for admission). Code V46.11 is questionable for initial visits versus follow up visits with newborns on continuous vent. It was discussed that HIM would perform additional research on this code as it pertains to newborns.**



**Frw: Interesting Findings for V46.11 & V46.13**  
Lindy A Peterson to: Victoria M Hernandez  
Cc: Marcus Lee, Hans Eric Tan, Roderick C Madamba

11/04/2013 05:20 PM  
[Hide Details](#)

From: Lindy A Peterson/CAK@PERM  
To: Victoria M Hernandez/CAK@PERM@KAI/PERM  
Cc: Marcus Lee/CAK@PERM, Hans Eric Tan/CAK@PERM, Roderick C Madamba/CAK@PERM@KAI/PERM

History: This message has been replied to.

Hi Victoria,

I filtered the file to the Explicit V46.11 & V46.13. When you want to look at the entire file, just select "Select all" for column "O".



Infant ACA for Rev Cycle.xlsx

Please let me know if you have any questions.

Thank you,

Lindy Peterson, CPC, CCS  
AHIMA Approved ICD-10-CM/PCS Trainer  
Manager, Auditing and Coding Services  
The Permanente Medical Group, Inc.  
Encounter Information Operations  
1350 Franklin St., 7th Floor  
(510) 987-4963 / 8-427-4963

**3) Dawna Toews and I reviewed Faye Brown and Coding Guidelines which only mentioned general guidelines and definition on V46.11 but not specific to newborns. We agreed that V46.11 is in reference to patients "dependent" to mechanical vent which is more long term.**

## **CODING CLINIC REFERENCES**

### **Mechanical ventilation using patient's equipment**

Coding Clinic, **Second Quarter 2013** Page 25 Effective with discharges: July 8, 2013

#### **Question:**

We have a patient with progressive muscular dystrophy dependent on mechanical ventilation at night and as needed during the day, who was admitted to the hospital in acute on chronic respiratory failure with acute tracheobronchitis. While in the hospital, the patient was able to connect to his own ventilator via his tracheostomy tube. The respiratory therapist did follow the patient during his stay. Since the patient is using his own ventilator, should we report the ventilator procedure code?

#### **Answer:**

It would be appropriate to assign a code from subcategory 96.7, Other continuous mechanical ventilation, for patients admitted on a home ventilator, since the patient is still receiving mechanical ventilation and is utilizing significant hospital resources. Begin counting the duration from the time of the admission. The count ends at the time of discharge. Ownership of equipment has no bearing on code assignment. Code V46.11, Other dependence on machines, Respirator, should be assigned as an additional code to indicate the dependence on mechanical ventilation.

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### **Respirator dependence**

Coding Clinic, **Fourth Quarter 2004** Page: 100 to 101 Effective with discharges: October 1, 2004

[Related Information](#)

#### **Respirator Dependence**

Effective October 1, 2004, code V46.1, Other dependence on machines, respirator, has been expanded to distinguish between respirator dependence status (**V46.11**) and encounters for respirator dependence during power failure (**V46.12**). Code V46.11 is used only if there are no complications or malfunctions of the respirator equipment, and is always a secondary code. By contrast, code V46.12 is only acceptable as a principal or first-listed code.

V46 Other dependence on machines

V46.1 Respirator

**New Code V46.11 Dependence on respirator,  
status**

**New Code V46.12 Encounter for respirator  
dependence during power  
failure**

**OFFICIAL ICD-9-CM GUIDELINES FOR CODING AND REPORTING**

**3) Status**

Status codes indicate that a patient is a carrier of a disease, has the sequelae or residual of a past disease or condition, or has another factor influencing a person's health status. This includes such things as the presence of prosthetic or mechanical devices resulting from past treatment. A status code is informative, because the status may affect the course of treatment and its outcome. A status code is distinct from a history code. The history code indicates that the patient no longer has the condition.

A status code should not be used with a diagnosis code from one of the body system chapters, if the diagnosis code includes the information provided by the status code. For example, code V42.1, Heart transplant status, should not be used with code 996.83, Complications of transplanted heart. The status code does not provide additional information. The

ICD-9-CM Official Guidelines for Coding and Reporting  
Effective October 1, 2011  
Page 66 of 107

**FROM DR. ROBERT GOLD, ASSOCIATION OF CLINICAL DOCUMENTATION  
IMPROVEMENT SPECIALISTS (ACDIS) ADVISORY BOARD and CEO FOR DCBA  
CLINICAL DOCUMENTATION IMPROVEMENT**

<http://www.cditalk.com/threads/496-Nighttime-CPAP-use-amp-v46-11-dependence-on-respirator>

Thread: Nighttime CPAP use &amp; v46.11 - dependence on respirator

04-19-2013, 09:22 AM

**REDACTED** **Nighttime CPAP use & v46.11 - dependence on respirator**

Junior Member

Join Date: Feb 2012  
Location: Oklahoma  
Posts: 13

Dr. G.  
Our inpatient coding manager recently read in an AAPC forum that night time CPAP use in a patient with Obstructive Sleep Apnea would code to V46.11 - dependence on respirator. Does this seem legitimate? We find it very questionable.

DCBA is the expert in improving existing programs


Like Sign Up to see what your friends like.

04-19-2013, 11:47 AM

**REDACTED** **REDACTED**

DrGold

CEO, DCBA, Inc.



Join Date: May 2010  
Location: Atlanta, Georgia  
Posts: 514  
Blog Entries: 11

I read your reference: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3103275/> and in my mind, this is inappropriate as you had suspected. The original V46.1 code was defined for use to designate a patient who will likely be on total support by artificial breathing mechanisms his/her entire life, such as use of an iron lung (read the description in the code book) when the code was invented for polio patients. Patients with high cervical spine fractures are dependent on a respirator to live. The code was not invented for people who occasionally use some positive pressure at night. That is NOT ventilator dependence. Besides, CPAP is not a mechanical ventilator - it is not a respirator. It's a passive positive pressure air or oxygen delivery system. CPAP may be used during weaning while the patient is still tubed, so the technique can be utilized in patients who have been on a ventilator.

Intensivists who use the term "ventilator dependent" for patients who are on a vent for 24 hours are misusing the term; but in their environment, it may be appropriate to write but not to code. People who are maintained paralyzed and ventilated after head traumas or people who are paralyzed while recovering from massive chest trauma are not "ventilator dependent" from a coder perspective - they are paralyzed and being vent managed, period. I have spoken with a physician at NCHS and one at WHO several times. They both say that there was an intent in development of ICD codes and people are expected to be mind readers and know what the intent was when nobody describes the intent for them in current coding guidelines. I believe this is one of those instances.

Dr. G.

## PEDIATRICS OFFICIAL JOURNAL OF THE AMERICAN ACADEMY OF PEDIATRICS

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3103275/>

### WHAT'S KNOWN ON THIS SUBJECT:

Children dependent on long-term mechanical ventilation are a diverse group who experience respiratory failure due to a variety of chronic conditions. Previous state-based analyses estimated a prevalence of 6 to 14 per 100 000 children but did not focus on age differences.

### WHAT THIS STUDY ADDS:

The rate of hospital discharges for children dependent on long-term mechanical ventilation has grown to 173.6 per 100 000 nonnewborn pediatric discharges in 2006. Young children and infants consume the highest proportion of health care resources and should be an area of additional study.

- 4) Code V46.11 was discussed with Gloryanne Bryant who also agreed with me and Dawna on not capturing this code for newborn initial visits where the newborn was weaned and discharged home. Since there were no specific Coding Clinic references specific to newborns, Gloryanne was to submit a question to Coding Clinic, which she has always done so in the past as point person for NCAL Regional HIM (i.e. Coding Roundtable, common trends, etc.).

**5) Email sent to Sue Bowman, AHIMA Senior Director of Coding and Compliance**

**From:** Sue Bowman [Sue.Bowman@ahima.org]  
**Sent:** 11/22/2013 01:25 PM GMT  
**To:** Gloryanne Bryant; "nleon@aha.org" <nleon@aha.org>  
**Subject:** RE: Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

Gloryanne,

V46.11 is intended for "dependence" on a ventilator – meaning long-term dependence (such as patients with spinal cord injuries or progressive neuromuscular diseases such as multiple sclerosis) – not for short-term use of a ventilator during an acute illness, following surgery, etc. So it seems unlikely that a newborn would be declared ventilator-dependent?

Sue Bowman, MJ, RHIA, CCS, FAHIMA  
Senior Director, Coding Policy and Compliance

**AHIMA** | American Health Information Management Association  
Phone: 312.233.1115 | Fax: 847.251.4742  
sue.bowman@ahima.org

**From:** Gloryanne.H.Bryant@kp.org [<mailto:Gloryanne.H.Bryant@kp.org>]  
**Sent:** Thursday, November 21, 2013 2:56 PM  
**To:** Sue Bowman; nleon@aha.org  
**Subject:** Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

Hi there, KP Question came up and I can not locate any guidance .....(I think the question is financially driven HCC - through the HIX methodology)

When a newborn is put on a vent, do we also add the V46.11 Dependence on respiratory, status (ventilator) on newborns??  
Our practice has been not to add this to the initial newborn record.

thoughts?

Gloryanne Bryant, RHIA, CDIP, CCS, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
National Director Coding Quality, Education, Systems and Support  
Regional HIM  
NCAL Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1800 Harrison St. 24th Floor, Oakland, CA 94612  
510 625-3980 (tel)  
510 625-5701 (fax)  
email: [Gloryanne.h.bryant@kp.org](mailto:Gloryanne.h.bryant@kp.org)  
Please visit the NCAL HIM resources, tools and information online at our wiki:  
<http://wiki.kp.org/wiki/x/fYDGBQ>

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- 6) On 11/25/13, we had an onsite staff meeting for our Regional Coding Review Managers and the topic on V46.11 coding was discussed and we all agreed that V46.11 would not be appropriate for newborn initial visits or follow up visits and if the newborn was weaned and discharged home.**
  
- 7) A follow up phone conference meeting was held on 12/3 @ 4pm (invitation sent by Sharonda Morris and Marcus Lee was chair). Attendees were Erica Eastham, Hans Eric Tan, Lindy Petersen, Marcus Lee, Rod Madamba and Victoria Hernandez. HIM provided our feedback and references on V46.11 and it was revealed that TPMG has moved forward with the policy of capturing ventilator dependence (V46.11) if a newborn was placed on mechanical vent for at least 12 continuous hours. This policy was to carry over with CDI (on HIM inpatient coding). HIM mentioned that based on the references and code definition of code V46.11, this scenario would not meet this code. I shared that a letter was sent to Coding Clinic posing this question specific to newborns. I mentioned that TPMG and HIM had a call pre-scheduled on 12/16 (routine phone conference).**
  
- 8) Rod gave me a contact person for Lucile Packard to inquire on their coding practice with newborn coding and V46.11. I sent an email to Andrea Houghton, Lucile Packard Coding Manager**

**RE: Contact info...**

Houghton, Andrea to: Victoria.M.Hernandez

12/04/2013 04:48 PM  
[Hide Details](#)From: "Houghton, Andrea" <AHoughton@LFCH.ORG>  
To: Victoria.M.Hernandez@KAIPERM@KAIPERM

History: This message has been replied to and forwarded.

▼ 1 attachment



Coding Foundtable 2013 03\_for Kaiser.doc

Hi, I'm attaching the conversation that the Children's Hospital Association (CHA) group had re: V46.11 (see yellow highlighted section). It is somewhat of a different conversation than the one you are having but with similar outcome. The CHA decided that it would not capture V46.11 in these cases. I agree with you-V46.11 is really for use in patients who are on vent chronically in Long Term Care or a SNF. It really would not be appropriate to capture in a patient who is on a ventilator for an acute respiratory condition, even if it progressed to a chronic state. Since you are capturing the respiratory condition that causes the patient to be on the ventilator and you have also captured the procedure code for ventilator assistance, V46.11 is not needed (and is a bit redundant).

Hope this helps...

From: Houghton, Andrea  
Sent: Wednesday, December 04, 2013 3:40 PM  
To: 'Victoria.M.Hernandez@kp.org'  
Subject: Contact info...

Hi Victoria, I just saw your email...I don't check my personal email much while I am at work so this is the best email to reach me at. Feel free to call or email me any time re: coding issues.

**Andrea Houghton, MPH, RHIA, CCS, CCS-P, CDIP**  
**AHIMA-Approved ICD-10-CM/PCS Trainer**  
 Coding Manager  
 Health Information Management Services  
 Lucile Packard Children's Hospital  
 4700 Bohannon Road Suite #274, M/C 5900  
 Menlo Park, CA 94025  
 Tel: 650.723.0751 Cell: 619.518.4752 Fax: 650.325.1788

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**9) On the same morning of 12/4, I read an email sent by Dr. Cachola (CDI) to review a power point presentation on criteria for coding the diagnoses for pediatric HHS HCCs by the medical group. The topic on V46.11 and 12 hours continuous ventilation was also in the power point. I called Dr. Cachola and explained the same discussion we had with TPMG. She asked me to join a phone call with CDI and Dr. Bliss at 1pm and I agreed.**

10) Still on 12/4 morning, I got a call from Anne Cadwell and Dr. Bliss who had Marcus Lee, Erica Eastham and other TPMG staff in their room asking me to provide a copy of the letter sent to Coding Clinic and that all letters/questions must first be preapproved by the Coding Governance Committee. I said I don't have a copy of the letter and that they may contact Gloryanne Bryant, who is out of state. They asked for her cell # which I provided but also told them that it's best to get a hold of Gloryanne via email.

11) Dawna Toews and I joined the CDI call with Dr. Bliss. We mentioned that the first time we heard about the 12-hour continuous ventilation rule = V46.11 was after 4pm the day before (when Rod and I were on the TPMG call). We were only asked to provide feedback, research, references/resources on V46.11, which we did but did not know that new policies were already taking place nor were included in the conversation. The Managing Director of HIM has been the point person to submitting questions to Coding Clinic as a result of Coding Roundtable, new topics, gray areas in coding, etc. Coders would not code V46.11 in this scenario and to change this practice, we would need additional guidance, update or change to support capturing this code in these scenarios straight from Coding Guidelines or Coding Clinic. We shared feedback from Dr. Gold (CDI expert), AHIMA and Lucile Packard. We were asked not to inquire outside KP anymore.

12) On 12/8, Dr. Cachola gave me an update (see email below)

From: Shirley Cochola/CA/KAIPERM  
To: Victoria M Hernandez/CA/KAIPERM@KAIPERM, Julie A Hager/CA/KAIPERM@KAIPERM  
Cc: Diane DWFOK/KAIPERM@Kaiperm, Roderrick C Madambal/CA/KAIPERM@KAIPERM  
Date: 12/08/2013 09:30 PM  
Subject: Re: Fw: HHS Codes

Thanks, Victoria - what we've agreed to with the med. group is to use "respirator dependence" for patients with tracheal intubation until the specifics are clarified by the coding clinic and to use "acute respiratory failure" for non-troched patients. Not sure this meets compliance since it is not defined but this is how med. group wishes to proceed for now.

Julie - can you add the information below to the "asthma" portion of the powerpoint as a slide? Thanks!

Shirley Cochola, MD  
Director, Clinical Documentation Integrity  
1800 Harrison, 10th fl., RM 104F05  
NCAL Kaiser Permanente  
Oakland, CA 94612-3430

phone: outside line: (510) 825-5852  
Blackberry: (510) 882-0184  
teline: 8-429-5852

**13) AHA email response regarding V46.11 on newborns**

From: Gloryanne H Bryant/CA/KAIPERM  
To: Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Cc: Dawna M Toews/CA/KAIPERM@KAIPERM  
Date: 12/06/2013 08:22 AM  
Subject: Fw: Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

Here's the AHA email response.....but I did submit the fax.

Gloryanne

----- Forwarded by Gloryanne H Bryant/CA/KAIPERM on 12/06/2013 08:21 AM -----

From: "Rapier, Anita" <arapier@aha.org>  
To: Gloryanne H Bryant/CA/KAIPERM@KAIPERM  
Cc: "Ayala, Karen" <kayala@aha.org>, "Leon-Chisen, Nelly" <nleon@aha.org>, "sue.bowman@ahima.org" <sue.bowman@ahima.org>  
Date: 12/06/2013 08:17 AM  
Subject: RE: Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

Yes, that is my interpretation.

**From:** Gloryanne.H.Bryant@kp.org [mailto:Gloryanne.H.Bryant@kp.org]  
**Sent:** Friday, December 06, 2013 10:13 AM  
**To:** Rapier, Anita  
**Cc:** Ayala, Karen; Leon-Chisen, Nelly; sue.bowman@ahima.org  
**Subject:** Re: Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

thanks

Thus if a newborn was placed on a vent for 12 or even 20 hours and then at discharge is NO longer on the vent, we would not assign the V 46.11 status code to that discharge/stay.

Gloryanne Bryant, RHIA, CDIP, CCS, CCDS  
AHIMA Approved ICD-10-CM/PCS Trainer  
National Director Coding Quality, Education, Systems and Support  
Regional HIM

National Revenue Cycle  
Kaiser Foundation Health Plan Inc & Hospitals  
1 Kaiser Plaza- 15th floor, Office #1543, Oakland, CA 94612  
510 625-3980 (tel)  
510 625-5701 (fax)

email: [Gloryanne.h.bryant@kp.org](mailto:Gloryanne.h.bryant@kp.org)

Please visit the NCAL HIM resources, tools and information online at our wiki:

<http://wiki.kp.org/wiki/x/fYDGBQ>

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From: "Rapier, Anita" <[arapier@aha.org](mailto:arapier@aha.org)>  
To: Gloryanne H Bryant/CA/KAIPERM@KAIPERM  
Cc: "Leon-Chisen, Nelly" <[nleon@aha.org](mailto:nleon@aha.org)>, "sue.bowman@ahima.org" <[sue.bowman@ahima.org](mailto:sue.bowman@ahima.org)>, "Ayala, Karen" <[kayala@aha.org](mailto:kayala@aha.org)>  
Date: 12/06/2013 08:11 AM  
Subject: Question: V46.11 Dependence on respiratory, status (ventilator) on newborns.

Hi Gloryanne,

Karen forwarded your question, since Nelly is out of the office on vacation. Traditionally, code V46.11 (respirator dependence status) is used to describe patients who have been dependent on mechanical ventilation over a period of time. It is not used for newborns who are placed on a vent for a short period. This is something that the Co-ops might agree to add to the ICD-10-CM Coding Guidelines since the ICD-9-CM Coding Guidelines are no longer being updated.

Anita

Anita Rapier, RHIT, CCS  
*Senior Coding Consultant*  
AHIMA Approved ICD-10-CM/PCS Trainer  
American Hospital Association  
155 N. Wacker Drive, Suite 400  
Chicago, IL 60606-1725  
Ph: 312-422-3386  
Fax: 312-268-0838  
[arapier@aha.org](mailto:arapier@aha.org)

# **EXHIBIT 21**

----- Forwarded by Victoria M Hernandez/CA/KAIPERM on 12/05/2013 03:22 PM -----

From: Shirley Cachola/CA/KAIPERM  
To: Victoria M Hernandez/CA/KAIPERM@KAIPERM  
Cc: Julie A Hager/CA/KAIPERM@KAIPERM  
Date: 12/05/2013 03:19 PM  
Subject: call with Dr. Bliss

Victoria - so sorry you got in the line of fire with some of Dr. Bliss's irritation with the letter of clarification that was sent to coding clinic without notifying the med. group around this respirator dependence issue--we both got the information late (I got it from med. group on 12/3 and sent it to you). Apparently, they had consulted compliance but went forward without clarification (we've been trying to develop these criteria with them for training since Sept.) Dr. Bliss wasn't upset with you but with the compliance folks. Thanks for taking the call and explaining. Our current plan is not to use respirator dependence but use acute respiratory failure instead, unless you see a problem with it. Let us know about the feedback from coding clinic if that will come to you or Gloryanne.

Julie - please substitute acute respiratory failure in place of respirator dependence per discussion with Dr. Bliss. Thanks!

Shirley Cachola, MD  
Director, Clinical Documentation Integrity  
1800 Harrison, 10th flr., RM 104R05  
NCAL Kaiser Permanente  
Oakland, CA 94612-3430

phone: outside line: (510) 625-5652  
Blackberry: (510) 882-0184  
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# **EXHIBIT 22**

**Gloryanne Bryant** <gloryanneb@sbcglobal.net>

To

victoriamhernandez@yahoo.com

Today at 5:29 PM

pls print out

[gloryanneb@sbcglobal.net](mailto:gloryanneb@sbcglobal.net)

--- On Mon, 12/9/13, <[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)> wrote:

> From: <[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)>

> Subject: Fw: Fw: HHS Codes

> To: [gloryanneb@sbcglobal.net](mailto:gloryanneb@sbcglobal.net)

> Date: Monday, December 9, 2013, 10:30 AM

>

>

> Dawna M Toews

>

> -----

> Original Message -----

>

> From: > Dawna M Toews

>

> Sent: 12/09/2013 08:01 AM PST

>

> To: Gloryanne Bryant

>

> Cc: Victoria Hernandez

>

> Subject: Re: Fw: HHS Codes

>

> How do you proceed when it is clearly out of compliance. Is Sue Muscarella

> aware.? I am not inclined to continue working for a company

> that blatantly ignores guidelines I have promised to follow,

> and that put me in jeopardy of losing my professional

> licensing.

>

>

> Nor will I put the license of my coders on the line without clear guidance from our

> cooperating parties. We cannot move forward with this

> type of guidance without an answer from Coding Clinic.

>

> Dawna M. Toews, MBA, RHIT,

> CCS, CRCR

> AHIMA Approved ICD 10 CM/PCS

> Trainer

>

- > Regional Director Coding
- > Operations
- > NCAL Revenue Cycle
- > Kaiser Foundations Health
- > Plan Inc& Hospitals
- > 1800 Harrison St., 24th
- > Floor, Oakland, CA 94612
- > 510--625-5650 (tel)
- >
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- >
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- >
- > Gloryanne H
- > Bryant---12/08/2013 10:31:38 PM---Not good. Gloryanne
- > Bryant, RHIA, CDIP, CCS, CCDS AHIMA Approved ICD-10-CM/PCS
- > Trainer
- >
- >
- >
- > From: Gloryanne H Bryant/CA/KAIPERM
- >
- > To: Victoria M Hernandez/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)
- >
- > Cc: Dawna M Toews/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)
- >
- > Date: 12/08/2013 10:31 PM
- >
- > Subject: Re: Fw: HHS Codes
- >
- > Not good.
- >
- > Gloryanne Bryant, RHIA,CDIP, CCS, CCDS
- > AHIMA Approved ICD-10-CM/PCS Trainer
- > National Director Coding Quality, Education, Systems and
- > Support
- > Regional HIM
- > National Revenue Cycle
- > Kaiser Foundation Health Plan Inc & Hospitals
- > 1 Kaiser Plaza- 15th floor, Office #1543, Oakland, CA 94612

- > 510 625-3980 (tel)
- > 510 625-5701 (fax)
- > email: [Gloryanne.h.bryant@kp.org](mailto:Gloryanne.h.bryant@kp.org)
- >
- > Please visit the NCAL HIM resources, tools and information
- > online at our wiki: <http://wiki.kp.org/wiki/x/fYDGBQ>
- >
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- >
- > Victoria M
- > Hernandez---12/08/2013 10:26:28 PM---FYI
- >
- >
- >
- > From: Victoria M Hernandez/CA/KAIPERM
- >
- > To: Gloryanne H Bryant/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM),
- > Dawna M Toews/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)
- >
- > Date: 12/08/2013 10:26 PM
- >
- > Subject: Fw: HHS Codes
- >
- > FYI
- >
- >
- >

- > VICTORIA M. HERNANDEZ, RHIA, CCS, CDIP, CRCR, AHIMA-Approved
- > ICD-10-CM/PCS Trainer
- > Regional Associate Director of Hospital Coding, Northern California
- > NCAL Revenue Cycle HIM
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- > Facsimile: (510) 625-5701
- > Email:[Victoria.M.Hernandez@kp.org](mailto:Victoria.M.Hernandez@kp.org)

- >
- > Please visit the NCAL HIM resources, tools and information online at our wiki:
- > HIM page: <https://wiki.kp.org/wiki/x/fYDGBQ>
- > Coders' Corner: <https://wiki.kp.org/wiki/x/g4DGBQ>
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> -----  
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> 10:26 PM -----

> From: Shirley Cachola/CA/KAIPERM  
>  
> To: Victoria M Hernandez/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM),  
> Julie A Hager/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)  
>  
> Cc: Diane Ott/PO/[KAIPERM@Kaiperm](mailto:KAIPERM@Kaiperm), Roderick C  
> Madamba/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)

>  
> Date: 12/08/2013 09:30 PM  
>  
> Subject: Re: Fw: HHS Codes  
>  
>  
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>  
>  
> Thanks, Victoria - what  
> we've agreed to with the med. group is to use  
> "respirator dependence" for patients with tracheal  
> intubation until the specifics are clarified by the coding  
> clinic and to use "acute respiratory failure" for  
> non-trached patients. Not sure this meets compliance  
> since it is not defined but this is how med. group wishes to  
> proceed for now.  
>  
>  
>  
> Julie - can you add the  
> information below to the "asthma" portion of the  
> powerpoint as a slide? Thanks!  
>  
>  
>  
> Shirley Cachola, MD  
>  
> Director, Clinical Documentation Integrity  
>  
> 1800 Harrison, 10th flr., RM 104R05  
>  
> NCAL Kaiser Permanente  
>  
> Oakland, CA 94612-3430  
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> phone: outside line: (510) 625-5652  
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>  
> Victoria M  
> Hernandez---12/08/2013 07:31:12 PM---Hi Dr. Cachola, Besides  
> the revision/discussion on mechanical ventilation, we would  
> just add the fol  
>  
>  
>  
> From: Victoria M Hernandez/CA/KAIPERM  
>  
> To: Shirley Cachola/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)  
>  
> Cc: Diane Ott/PO/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM), Julie A  
> Hager/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM), Roderick C  
> Madamba/CA/[KAIPERM@KAIPERM](mailto:KAIPERM@KAIPERM)  
>  
> Date: 12/08/2013 07:31 PM  
>  
> Subject: Re: Fw: HHS Codes  
>  
> Hi Dr. Cachola,  
  
> Besides the revision/discussion on mechanical ventilation, we would just  
> add the following comments on the asthma slide (or something  
> similar). Thank you.  
>  
>  
> VICTORIA M. HERNANDEZ, RHIA, CCS, CDIP, CRCR, AHIMA-Approved  
> ICD-10-CM/PCS Trainer  
>  
> Regional Associate Director of Hospital Coding, Northern

- > California
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- > iPhone: (510)
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- > Facsimile:
- > (510) 625-5701
- >
- > Email:
- > [Victoria.M.Hernandez@kp.org](mailto:Victoria.M.Hernandez@kp.org)
- >
- > Please
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- > Corner: <https://wiki.kp.org/wiki/x/g4DGBQ>
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>  
>  
> Shirley  
> Cachola---12/03/2013 02:39:56 PM---Victoria - the attachment  
> below is the med. group presentation of criteria for coding  
> the diagnoses  
>  
>  
>  
> From: Shirley Cachola/CA/KAIPERM  
>  
> To: Victoria M  
> Hernandez/CA/KAIPERM@KAIPERM  
>  
> Cc: Roderick C Madamba/CA/KAIPERM@KAIPERM,  
> Julie A Hager/CA/KAIPERM@KAIPERM, Diane  
> Ott/PO/KAIPERM@Kaiperm  
>  
> Date: 12/03/2013 02:39 PM  
>  
> Subject: Fw: HHS Codes  
>  
>  
>  
>  
>  
> Victoria - the attachment  
> below is the med. group presentation of criteria for coding  
> the diagnoses for pedi. HHS HCC's to use for querying in  
> 2014. Julie has the associated codes for the  
> HCC's. We are missing anorexia/bulemia, which will  
> be provided by med. group later. Please discuss with  
> Rod and review for approval/corrections prior to us  
> presenting the information to the CDI SC's on 12/10  
> (Tues).  
>  
>  
>  
> Shirley Cachola, MD  
>  
> Director, Clinical Documentation Integrity  
>  
> 1800 Harrison, 10th flr., RM 104R05  
>  
> NCAL Kaiser Permanente  
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> Forwarded by Shirley Cachola/CA/KAIPERM on 12/03/2013 02:34  
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>  
>  
>  
> From: Erica E Eastham/CA/KAIPERM  
>  
> To: Donna K Mclvor/CA/KAIPERM@KAIPERM  
>  
> Cc: David Bliss/CA/KAIPERM@KAIPERM, Julie A  
> Hager/CA/KAIPERM@KAIPERM, Shirley  
> Cachola/CA/KAIPERM@KAIPERM, Susan D  
> Ingebretsen/CA/KAIPERM@KAIPERM  
>  
> Date: 12/03/2013 08:50 AM  
>  
> Subject: Re: HHS Codes

>  
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>  
> [attachment  
> "Presentation to PICU PEDIHBS and NICU CDI Nurses\_  
> 20131202 v6.pptx" deleted by Victoria M  
> Hernandez/CA/KAIPERM]  
>  
>  
>  
>  
>  
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>  
> Thanks,  
>  
> Erica  
>  
>  
>  
> Erica E. Eastham, CCS-P  
>  
> AHIMA Approved ICD-10-CM/PCS Trainer  
>  
> Director, Documentation Quality and Training  
>  
> The Permanente Medical Group, Inc. - Encounter  
> Information Operations  
>  
> 1950 Franklin St. Oakland, CA. 94612  
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>  
> Cell (510) 414-4774  
>  
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>

> Donna K  
> Mclvor---12/03/2013 08:22:04 AM---Hi Dr Bliss and Erica, Dr.  
> Cachola asked about the criteria for the NICU, PICU and  
> adult HHS codes?

>  
>  
>

> From: Donna K Mclvor/CA/KAIPERM

>

> To: David Bliss/CA/KAIPERM, Erica E  
> Eastham/CA/KAIPERM@KAIPERM

>

> Cc: Shirley Cachola/CA/KAIPERM@KAIPERM, Susan  
> D Ingebretsen/CA/KAIPERM@KAIPERM, Julie A  
> Hager/CA/KAIPERM@KAIPERM

>

> Date: 12/03/2013 08:22 AM

>

> Subject: HHS Codes

>

> Hi Dr Bliss and Erica,

>

> Dr. Cachola asked about the  
> criteria for the NICU, PICU and adult HHS codes? I guess that these  
> were supposed to be provided by Thanksgiving for CDI  
> and HIM to review prior to our CDI 12/10 mtg.?

>

>

>

> So that is why I am sending this email out to you - for your feedback on these HHS  
> codes.

> Donna K. Mclvor, RN,MSN, CRCR  
> Regional Manager, Clinical  
> Documentation Integrity (CDI)

>

- > NCAL Revenue Cycle Integrity
- > Kaiser Foundation Health Plan
- > Inc & Hospitals
- > 1800 Harrison St. 10th Floor,
- > Oakland, CA 94612
- > Office:(510) 625-6434
- > Blackberry:(510)
- > 606-0191
- >
- > FAX: (510) 625-3340
- >
- > Email: [Donna.K.Mclvor@kp.org](mailto:Donna.K.Mclvor@kp.org)
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## Asmtha – cont'd

- Extrinsic Asthma NOS
  - Extrinsic Asthma with status asthmaticus
  - Extrinsic Asthma with acute exacerbation
  - Intrinsic Asthma NOS
  - Intrinsic Asthma with status asthmaticus
  - Intrinsic Asthma with acute exacerbation
  - Chronic Obstructive Asthma NOS
  - Chronic Obstructive Asthma with status asthmaticus
  - Chronic Obstructive Asthma with acute exacerbation
  - Exercise Induced Bronchospasm
  - Cough variant Asthma
  - Asthma NOS
  - Asthma with status asthmaticus
  - Asthma NOS with acute exacerbation
- 
- Simple Asthma NOS **does** increase the risk score.
  - "possible", "probable", "suspected" will count for coding **if** documented at the time of discharge..
    - Example: Probable Asthma is acceptable.

# **EXHIBIT 23**

Kaiser Permanente

# Neonatal Intensive Care Unit Diagnostic Guidelines

---

## Content Contributors:

Lawrence Dong, MD – Santa Clara  
Allen Fischer, MD – Walnut Creek  
Mark Ziegler, M.D. – Roseville  
Michael W Kuzniewicz, MD – Oakland  
Michael Jennis, MD - Oakland

**Publish date - 11/18/13**

**Revision date – 3/17/14**

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**REL0001003**

## **Table of Contents**

Respirator / Ventilator Dependence	Page 2
Acute Respiratory Failure	Page 2
Congestive Heart Failure	Page 3
Shock	Page 13
SIRS / Sepsis	Page 15

## Respirator / Ventilator Dependence

There are no clear-cut coding references that define the description "Dependence on respirator, status" for code V46.11. Coders are instructed by all coding references to assign codes based on physician documentation. Due to the lack of coding guidelines and encoder edits, it is best to depend on the guidance of the physician's documentation for code assignment.

TPMG NICU Leadership in collaboration with NCAL HIMS has agreed to following criteria for assignment of 'Dependence on respirator, status' [V46.11]

- Patient has an endotracheal tube or tracheostomy tube in place and is receiving respiratory support from a conventional (volume or pressure limited modes) or high frequency ventilator for > 30 days, or
- Patient was discharged home on a respirator.

Database Matches			
Match: res dep			Find
ID	Name	Code	Code Set
530739	ENCOUNTER FOR RESPIRATOR DEPENDENCE DURING POWER FAIL	V46.12	ICD-9-CM
517389	PERSONAL CONDITION OF RESPIRATORY DEPENDENCE	V46.11	ICD-9-CM
526319	PERSONAL CONDITION DEPENDENCE ON RESPIRATORY ASSIS (aka	V46.8	ICD-9-CM
526320	PERSONAL CONDITION DEPENDENCE ON RESPIRATORY ASSIS (aka	V46.8	ICD-9-CM
529528	PERSONAL CONDITION OF DEPENDENCE ON RESPIRATOR	V46.11	ICD-9-CM

## Acute Respiratory Failure

One of the most common and concerning complications seen in low-birth-weight infants is chronic lung disease.

Noninvasive ventilation (NIV), a term applied to a variety of devices capable of supporting neonatal ventilation without the use of an endotracheal tube, is receiving increasing attention as means to reduce damage often incurred with mechanical ventilation.

This guideline will provide an overview of some of the types of NIV being used in neonates and when those mechanisms of delivery would qualify a patient as having Acute Respiratory Failure.

## **TYPES OF NONINVASIVE VENTILATION**

### **CPAP**

CPAP, the application of continuous pressure throughout the respiratory cycle, can be provided by a variety of devices ranging from simple bubble CPAP to sophisticated dedicated mechanical ventilators. CPAP pressure is generated by 1 of 2 mechanisms: varying the flow rate (variable flow devices) or providing a constant flow of gases and varying the pressure by another mechanism (continuous flow devices).

Continuous flow devices include the following: neonatal ventilators that provide a continuous flow of fresh gas and vary the level of positive pressure by controlling gas outflow; and bubble CPAP that generates pressure by submerging the expiratory tubing in a water chamber with the level of water determining the level of CPAP. Bubble CPAP creates chest wall vibration similar to that of high-frequency ventilation that may increase gas exchange although this is disputed.

### **High-flow nasal cannula**

Positive pressure is also generated with the use of nasal cannula. The level of pressure generated by nasal prongs varies according to the flow rate, the type of cannula used, and infant size.

### **Phasic positive pressure devices**

Phasic NIV consists of positive pressure applied across the respiratory cycle combined with periods of increased airway pressure. Intermittent increases in airway pressure (breaths) may be delivered at regular intervals (nonsynchronized) or synchronized with infant inspiratory efforts. The majority of systems currently in use in North America feature some type of synchronization; synchronized NIPPV has also received the most attention in clinical trials.

### **KP NCAL defines Acute Respiratory Failure as follows:**

When any of the following treatments are used individually or collectively for more than 12 continuous hours

- The patient has nasal prongs in place and is having her respiration supported with any device providing nasal continuous positive airway pressure (NCPAP), BIPAP (bi-level positive airway pressure), or NIPPV (non-invasive positive pressure ventilation). The later 2 modalities are enhanced versions of NCPAP with interspersed positive pressure breaths.
- HFNC (high flow nasal cannula) of 2L or more (which is the equivalent of NCPAP).

## **Congestive Heart Failure**

Congestive Heart Failure relative to the Infant Model (birth to 1year), Affordable Care Act  
Some supporting literature in regards to diagnosis and guidance in documentation

Reminder: Prior to Infant Model initiation, HYDROPS is fetal congestive heart failure so feasible to make diagnosis at time of birth

Additional References:

A Neonatology Review, 2<sup>nd</sup> edition, 2010, Dara Brodsky, MD

B NEOREVIEWS Vol. 7 No. 2 February 1, 2006 pp. e88 -e94 (doi: 10.1542/neo.7-2-e88)

C NEOREVIEWS September 1, 2010 vol. 11 no. 9 e495-e502 doi:10.1542/neo.11-9-e495

D NEOREVIEWS Vol. 1 No. 8 August 1, 2000 pp. e139 -e145 (doi: 10.1542/neo.1-8-e139)

E Specialty Review in Neonatology, Feb 19-24, 2013; presentation by Laurie Armsby, MD, Division of Pediatric Cardiology, Oregon Health Sciences University

Congestive Heart Failure in Newborn period outline:

PDA (patent ductus arteriosus)

Congenital Heart Disease (structural)

Inadequate myocardial function (myopathies, metabolic, vascular, infectious, etc)

Reference A.

Clinical Diagnosis

### **C. CONGESTIVE HEART FAILURE (CHF)**

Signs and symptoms resulting from inability of heart to meet demands of body

Hydrops if severe fetal CHF; otherwise, symptoms can include tachypnea, tachycardia, hepatosplenomegaly, weak peripheral pulses, +/- gallop

CXR with increased heart size, increased PVM; Kerley B lines — short horizontal linear densities in lung extending to pleura due to interstitial edema; often difficult to detect in neonates

Medical management with diuretics, inotropic agents

Reference B.

Pulmonary edema can be caused postnatally by many disorders; those that occur frequently during the neonatal period are patent ductus arteriosus or structural congenital heart disease with marked left-to-right shunting.

The most common mechanism causing increased fluid movement out of the microvasculature is an increase in the transvascular pressure gradients, as clinically occurs in congestive heart failure (CHF).

Reference C.

Patent Ductus Arteriosus: in Preterm Infants

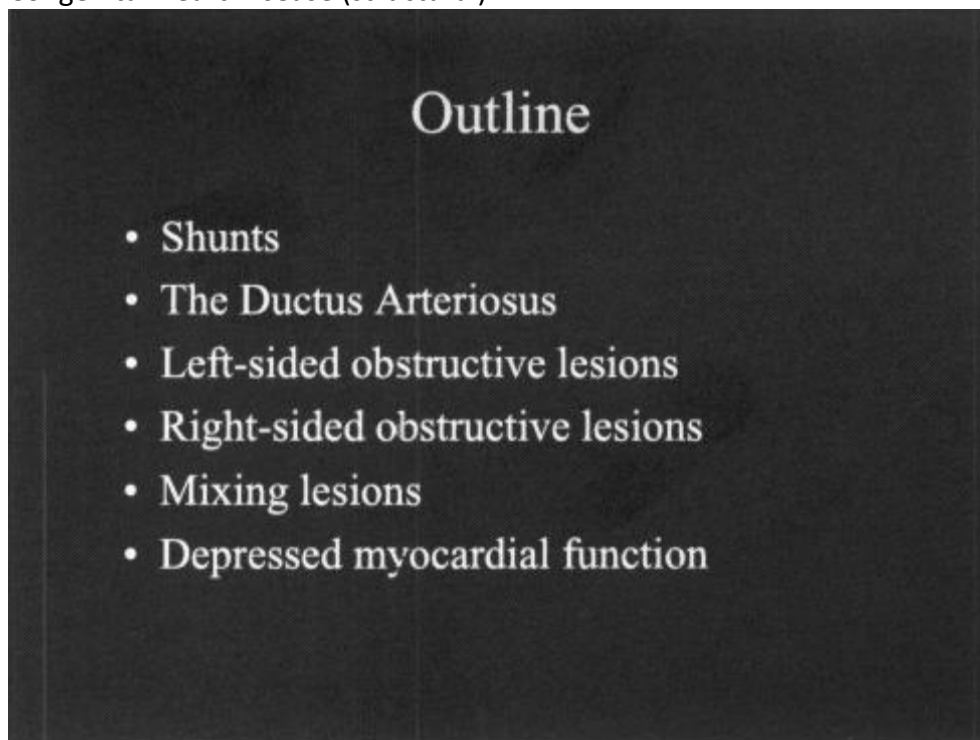
Table.

Hemodynamically Significant Patent Ductus Arteriosus (HSDA)

Echocardiographic Criteria
Transductal diameter (TDD) >1.5 mm Unrestrictive pulsatile transductal flow Left heart volume loading (eg, left atrium-to-aortic root ratio of 1.5 to 2:1)
Systemic Hypoperfusion (Decreased Qs)
Systemic hypotension Evidence of end-organ hypoperfusion, renal insufficiency, NEC, IVH Acidosis (lactic, metabolic)
Pulmonary Overcirculation (Increased Qp)
Oxygenation failure Increased ventilation requirements Radiologic evidence of cardiomegaly or pulmonary edema

Reference D.

Congenital Heart Disease (structural)



## Pathophysiology of PDA in the Preterm Infant

### Principles:

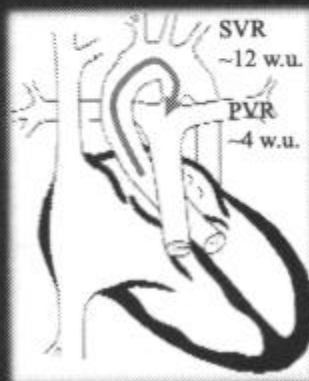
- Pulmonary overcirculation
- Diastolic run-off (wide PP)
- Increased cardiac work



## Pathophysiology of PDA in the Preterm Infant

### Pulmonary overcirculation

- Excessive volume in pulmonary circulation
- Enlarged MPA, LA/LV
- Stretched PFO with L→R shunt
- Poor oxygen/CO<sub>2</sub> exchange
- Tachypnea, increased work of breathing
- Incrd pulm vascularity on CXR
- Steal from systemic circulation
- Poor feeding/weight gain



## Recognizing the Pre-term Neonate with a PDA

Sx:

Fatigued, sweaty

Sn:

Tachypneic, mildly hypoxic, rales, tachycardic, poor wt gain, bounding pulses, continuous murmur

CXR:

Incr'd vascular markings & MPA,  $\pm$  cardiomegaly



## Recognizing the Pre-term Neonate with a PDA

Sx:

Fatigued, sweaty

Sn:

Tachypneic, mildly hypoxic, rales, tachycardic, poor wt gain, bounding pulses, continuous murmur

CXR:

Incr'd vascular markings & MPA,  $\pm$  cardiomegaly

Question #3: What other cardiac lesions present like this?


## Recognizing the Pre-term Neonate with a PDA

**Sx:**  
Fatigued, sweaty


**Sn:**  
Tachypneic, mildly hypoxic, rales, tachycardic, poor wt gain, bounding pulses, continuous murmur


**CXR:**  
Incr'd vascular markings & MPA,  $\pm$  cardiomegaly

VSD




CoA

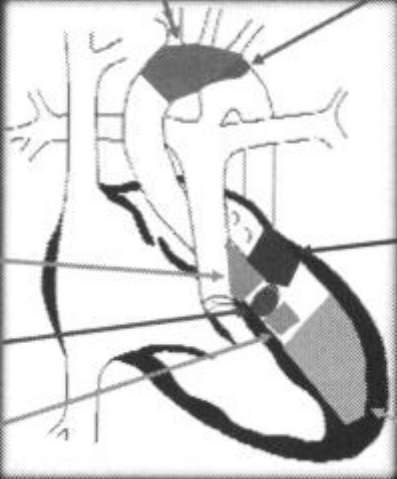




ASD



## Left-sided Obstructive Lesions



**Interrupted Aortic Arch**

**Coarctation of the Aorta**

**Hypoplastic Left Heart Syndrome**

**Shones Syndrome**

**Supra-valvar Aortic Stenosis**

**Aortic Stenosis**

**Sub-Aortic Stenosis**

**Mitral Stenosis**

**Dysfunctional or Hypoplastic LV**

## Recognizing the Infant with a Left-sided obstructive lesion

Before ductus closes:

Systolic murmur, differential  $O_2$  sats

As/after ductus closes:

Gallop,  $\pm$  murmur, weak pulses, cool extremities, poor perfusion, tachypnea, cardiogenic shock, acidosis

Dominant early feature: cardiogenic shock (resembling sepsis)

CXR:

Incr'd vascular markings,  $\pm$  cardiomegaly



## Right-sided Obstructive Lesions

Tetralogy of Fallot

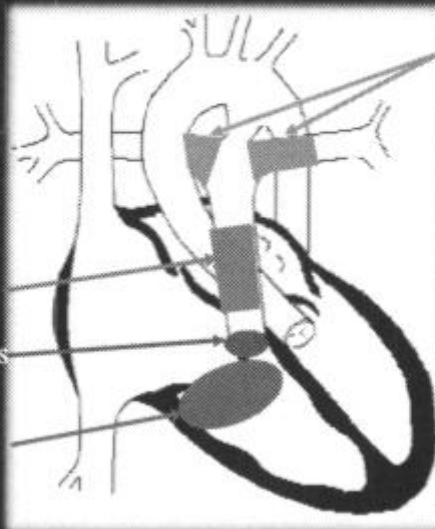
Pulm Atresia/VSD

supravalvar pulmonary stenosis

pulmonary stenosis or atresia

tricuspid stenosis or atresia

neonatal Ebsteins



branch pulmonary stenosis

## Recognizing the Infant with a Right-sided obstructive lesion

Before ductus closes:

± Systolic murmur, hypoxemia, bounding pulses

As/after ductus closes:

± murmur, tachypnea, severe hypoxemia; followed by cardiogenic shock, acidosis

Dominant early feature: cyanosis

CXR:

Decr'd vascular markings



## Mixing Lesions

Question #12: Name 8 mixing lesions

CAVC



Common Atrium, ASD



Truncus



VSD



DILV

DORV



Unbalanced AVC



AP window



## Recognizing the Infant with a mixing lesion

Before ductus closes:

± systolic murmur, hypoxemia

As/after ductus closes:

no difference

In the older infant:

tachypnea, murmur, hypoxemia, poor wt gain, poor feeding, diaphoresis

Dominant early feature: murmur

CXR:

Increased vascular markings, ± cardiomegaly



## Recognizing the Infant with a cardiomyopathy

Hypotension, tachycardia, poor perfusion, cool extremities, diaphoresis

Dominant early feature: poor perfusion, tachycardia

CXR:

Cardiomegaly



E.

#### DILATED CARDIOMYOPATHY

##### PHYSICAL EXAMINATION

The signs of congestive heart failure include tachypnea, tachycardia, narrow pulse pressure with decreased peripheral pulses, hepatomegaly, and pallor. In severe cases, there may be cardiovascular collapse. Cyanosis is rare, but wheezing is common. Rales are seldom present in infants, but may be noted in older children.

Results of the cardiac examination may be subtle. Muffling of heart sounds occasionally is noted, although a gallop is a much more common finding. In some cases, the murmur of mitral insufficiency may be appreciated at the apex.

#### HYPERTROPHIC CARDIOMYOPATHY

Infants who have hypertrophic cardiomyopathy most typically present with congestive symptoms, including tachypnea, poor feeding, and growth failure. In some cases, the diagnosis is made because of a prior diagnosis in another family member; occasionally, a near-miss sudden death episode from arrhythmia is the sentinel event. Congestive symptoms are due to diastolic dysfunction of the left ventricle that causes elevated pulmonary venous pressure. This does not correlate well with the degree of left ventricular obstruction.

##### PHYSICAL EXAMINATION

The physical examination findings generally are related to the presence of left ventricular outflow obstruction. The degree of outflow obstruction is highly variable, and it may be absent. In patients who do not have outflow obstruction, findings on physical examination may be entirely normal, suggesting the need for routine echocardiography in patients whose history strongly suggests the possibility of hypertrophic cardiomyopathy. Patients who have outflow obstruction will have evidence of a systolic ejection murmur in the aortic region. Infants may have a subpulmonary obstruction as well, giving rise to a somewhat louder systolic murmur in the pulmonic valve area. In infants, hepatomegaly also may be observed.

CDI Criteria:

Documentation of PDA

Existing dxs that would include CHF

Review of chest xray that shows evidence of pulm edema, cardiomegaly

Echo with existing Problem List dx of heart dz

Lasix (daily)

Restriction of fluids prior to diuretics

## **SHOCK**

Shock is a complex syndrome of circulatory dysfunction associated with reduced oxygen and nutrient delivery to peripheral and ultimately to central organs. The etiology is multifactorial. The major secondary complication of severe shock is a syndrome characterized as Systemic Inflammatory Response Syndrome (SIRS).

Likely clinical contexts for development of shock:

- Feto-maternal hemorrhage
- Vasa previa
- Cord accidents/acute bleeding
- Perinatal asphyxia
- ELBW infant
- Chorioamnionitis
- Severe sepsis
- Unreplaced fluid losses

Clinical features of shock

- Hypotension
- Peripheral vasoconstriction
- Poor capillary refill (>3 seconds)
- Tachycardia
- Bradycardia in ELBW
- Tachypnea
- Hypoxia
- Metabolic/lactic acidosis
- CNS disturbances (lethargy, irritability)
- Oliguria (<0.5 ml/kg/hours)
- Coagulopathy

Treatment may include:

- Respiratory support
- Volume expansion
- Alkali therapy
- Vasopressor agents
- Antibiotics
- Blood products

Considerations for coding: There is no single diagnostic test or clinical parameter that defines shock in the neonatal population. **If two or more of the following 6 conditions are present the patient warrants a diagnosis of shock.**

Blood pressure: Shock usually includes a component of hypotension, however blood pressure may be normal in the early phase of shock (compensated). The presenting signs may be tachycardia (>180 bpm) or a change in heart rate over the baby's previous baseline rate. In conjunction with other evidence of poor tissue perfusion or organ dysfunction in at least one other system (see below) the coding for shock may be appropriate.

A single volume bolus, possibly repeated again, is used often for blood pressure readings falling below a target range, or for metabolic acidosis, without evidence of other organ dysfunction. Those situations would not qualify for a shock coding.

However, hypotension (need for > 2 boluses) without improvement, or need for an inotrope would support a shock coding.

Evidence of cardiac dysfunction: an echocardiogram indicating poor myocardial function, decreased cardiac output, or an obstructive cardiac lesion in conjunction with hypotension, or persistent acidosis or other evidence of organ dysfunction would warrant a shock coding.

Capillary Refill Time (CRT) and Central-peripheral Temperature difference (CPTd): delayed capillary refill (>3 sec) or CPTd (>2 °C) may help support a shock diagnosis, but should not be the sole criteria for a shock coding.

Acidosis: a persistent lactic acidosis (>2.5 mmol/liter) would be supportive of a shock coding if other causes (inborn error of metabolism) have been ruled out.

Urine output: decreased urine output may be physiologic in the first 24 hours, and there are some technical difficulties in obtaining accurate measurements. Oliguria (<.5ml/kg/hour) would be supportive of a shock coding if other factors (volume status, intrinsic renal disease) have been ruled out.

Coagulopathy: active bleeding or abnormal coagulation studies would be an ominous late sign of shock. If other etiologies are ruled out, coagulopathy would be supportive of a shock coding.

## **SIRS / SEPSIS**

The clinical syndrome defined by the presence of **both** infection and a systemic inflammatory response (SIRS).

### **Infection**

Documented or suspected

Positive blood or CSF culture for a pathogenic organism

Negative blood culture but treatment with antibiotics by the medical team for 7 days; no apparent infection at another site

### **SIRS (Need at least 3 of the following):**

#### **General parameters**

Fever (temperature  $>38.5^{\circ}\text{C}$ )

Hypothermia (core temperature  $<36^{\circ}\text{C}$ )

Heart rate  $>180$  bpm

Tachypnea:  $>60$  breaths/minute

Lethargic

Significant edema or positive fluid balance ( $>20$  ml/kg over 24 h)

Hyperglycemia (plasma glucose  $>180$  mg/dL)

Apnea  $>$  usual baseline

#### **Inflammatory parameters**

Leukocytosis (white blood cell count  $>20,000/\mu\text{l}$ )

Leukopenia (white blood cell count  $<5,000/\mu\text{l}$ )

Normal white blood cell count with  $>15\%$  immature forms

Plasma C reactive protein  $>3$

#### **Hemodynamic parameters**

Arterial hypotension (systolic blood pressure  $<$  or mean arterial pressure  $<2$  SD below normal for age)

Shock

#### **Organ dysfunction parameters**

Arterial hypoxemia ( $\text{PaO}_2/\text{FiO}_2 <300$ )

Acute oliguria (urine output  $<0.5$  ml kg/hour)

Creatinine  $>1.5$  mg/dL

Coagulation abnormalities (international normalized ratio  $>1.7$  or activated partial thromboplastin time  $>60$  s)

Ileus

Thrombocytopenia (platelet count  $<100,000/\mu\text{l}$ )


#### **Tissue perfusion parameters**

Hyperlactatemia ( $>2$  mmol/l)

Decreased capillary refill or mottling (capillary refill time  $>3$  seconds)

# **EXHIBIT 24**

SCAL



Health Insurance Exchange (HIX)  
Neonatology  
Documentation and Coding 2014



Neonatology

Neonatology

**CLINICAL DOCUMENTATION  
& Audit Operations**

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# Today's Discussion

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SCAL Neonatology Training Plan

Healthcare Reform and the Risk Adjustment Payment Model

The Infant Model

Documentation and Coding Guidelines

SCAL Neonatology High Acuity HIX Diagnoses

Appendix

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## Commonly Used Acronyms

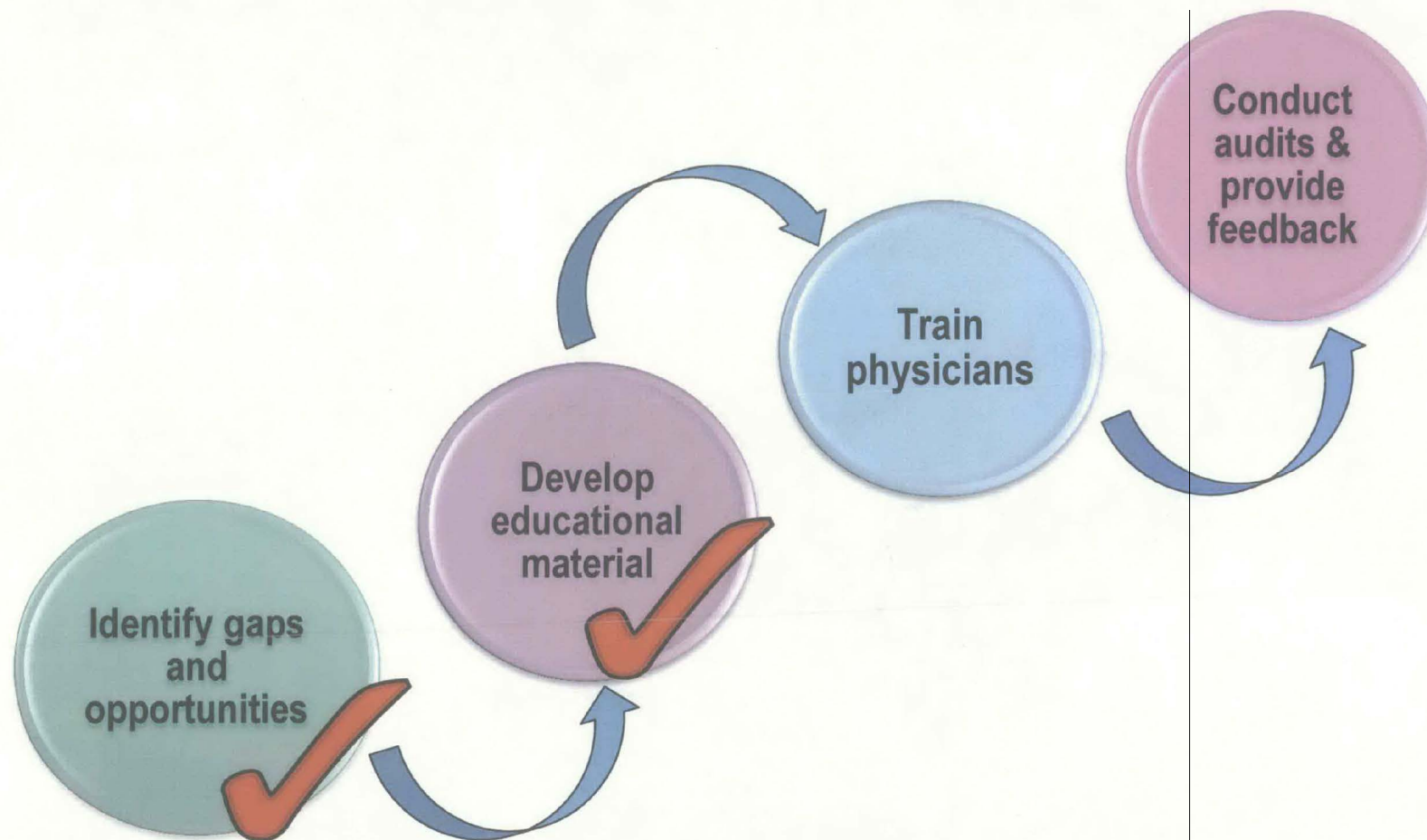
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- HIX: Health Insurance Exchange
- HHS: Department of Health and Human Services
- HCC: Hierarchical Conditions Categories
- CMS: Centers for Medicare and Medicaid Services

# SCAL Neonatology Training Team

- SCAL Neonatology Training Team
  - David Braun, MD, Regional Physician Coordinator, Perinatal Services
  - Mandhir Gupta, MD, Physician Coordinator, Downey Medical Center
  - Terri Ma, Practice Specialist, Clinical Documentation and Audit Operations
  
- Worked in collaboration with NCAL Neonatology
  
- Data Analysis included:
  - CPQCC California Perinatal Quality Care Collaborative
  - Pulled ICD 9 Codes reported for all patients in CPQCC
  - Reviewing Utilization reports for Neonatology to identify areas of missed opportunities

## Steps of Implementation





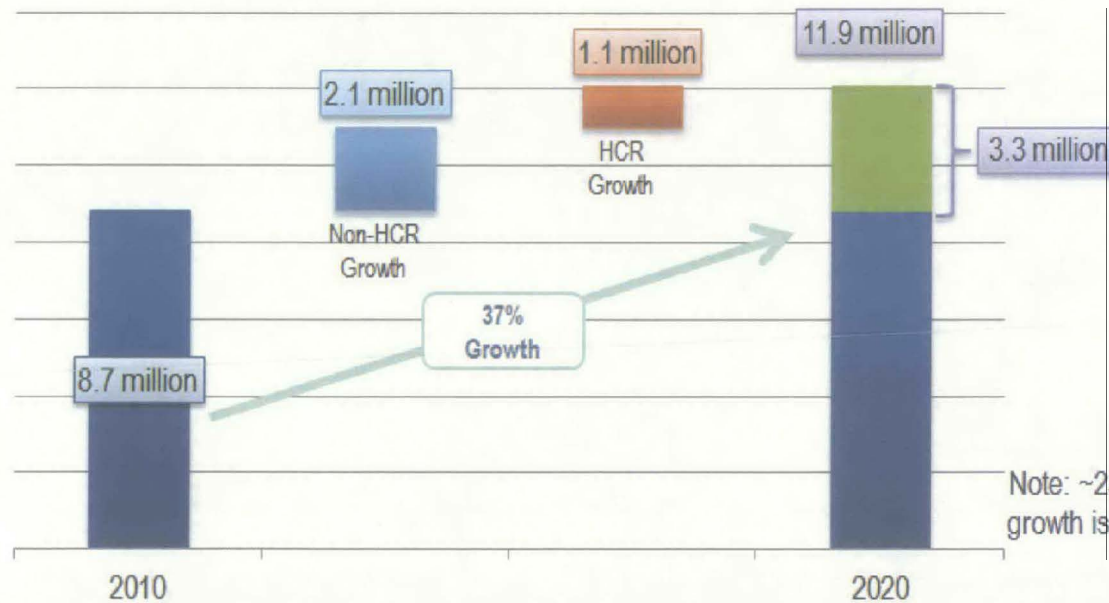
## Risk Adjustment Payment Model

## Why is Risk Adjustment Important?

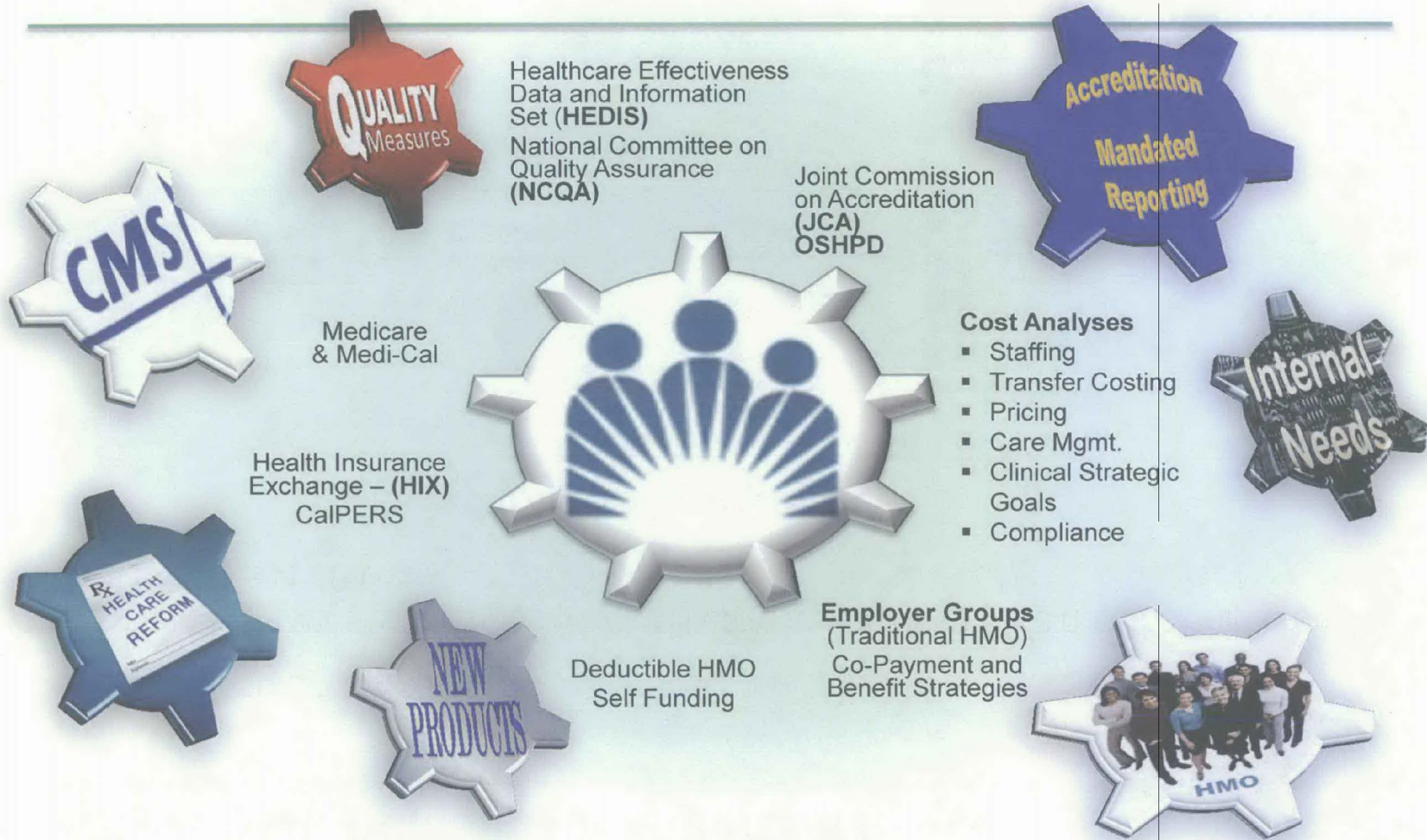


- Health Insurance Exchanges takes effect on- **1/1/2014**
- Health Insurance Exchanges (HIX) will drive about 1/3 of KP's membership growth over the next 10 years

### Projected KP Membership Growth



# Medical Coding Impacts Every Aspect of Our Organization



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## Risk Adjustment Payment Model Comparison

### Medicare Advantage

- Since 2003
- Member age: 65+
- 79 HCCs
- 3,033 Diagnoses
- Prospective Payment Model: data captured for current year will impact payment for the following year

### Health Insurance Exchanges

- New for 2014
- Member age: 0 – 64
- 127 HCCs
- 3,473 Diagnoses
- Concurrent Payment Model: 2014 data capture impacts 2014 payment



## Health Insurance Exchange (HIX) HCC Model

- Model is concurrent: 2014 data capture impacts 2014 payments
- Diagnoses must be reported at a **minimum** once each calendar year
  - by SCPMG physicians and/or physician extenders
  - at any setting including in-patient, out-patient and ED
- Diagnoses must be reported from a face-to-face encounter



## Neonatal Patients Are Important in HIX:

- Percentages of members with HIX-HCCs (based on FFS Data)
  - *Adult 19%*
  - *Child 9%*
  - **Infant 45%**

45% of infant members will have an HHS-HCC diagnosis





## The Infant Model

## The Infant Model



- Ages **0 – 24** months



*We know...*

- Infant risk score is determined by **Maturity** and **Severity** of diagnosis
- A **Severity Level** is assigned to each diagnosis in the Infant Model
  - Includes virtually all of the adult and child HCCs (and more)
  - Severity Levels: 1 through 5
- Many of the more severe conditions will be hospital diagnoses

## HIX Newborn Maturity Categories



Maturity Category	Birth Weight (grams)
Extremely Immature	< 500
	500 – 749
	750 – 999
Immature	1000 – 1499
	1500 – 1999
Premature	2000 – 2499
Malnourished & Multiples	No requirement
Term	Normal or High

## Examples of Severity Categories



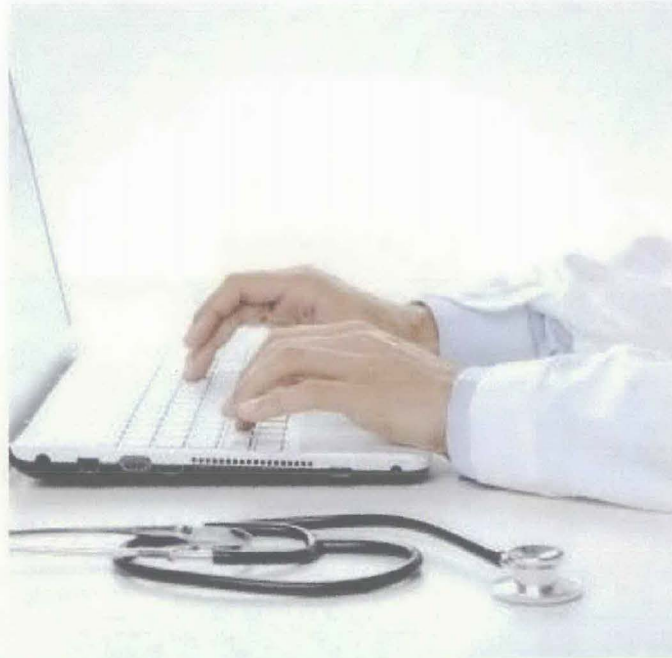
Severity Category	Examples of HHS-HCCs included
Severity Level 5	Respirator Dependence/Tracheostomy Status
Severity Level 5	Hypoplastic Left Heart Syndrome and Other Severe Congenital Heart Disorders, Congestive Heart Failure
Severity Level 4	Septicemia, Sepsis, Systemic Inflammatory Response Syndrome/Shock
Severity Level 4	Aspiration and Specified Bacterial Pneumonias and Other Severe Lung Infections
Severity Level 3	HIV/AIDS
Severity Level 3	Acute Liver Failure/Disease, Including Neonatal Hepatitis
Severity Level 2	Drug Dependence
Severity Level 2	Protein-Calorie Malnutrition
Severity Level 1	Acute Pancreatitis/Other Pancreatic Disorders and Intestinal Malabsorption
Severity Level 1	Chronic Kidney Disease, Severe (Stage 4)

## This is How Newborn Maturity & Severity Comes Together

Newborn Maturity Level	Severity Category Scores				
	Severity 1	Severity 2	Severity 3	Severity 4	Severity 5
Extremely Immature < 999 grams	59	59	59	222	391
Immature 1000 - 2499 grams	31	31	44	87	205
Premature/Multiples	6	8	17	32	171
Term	1.00	3	6	19	131
Age 1	0.33	2	3	10	61

## Newborn HHS HCC Case Examples

Case Example	Maturity	Condition	Severity	Risk Score
Premature infant weights 745 g with "Respiratory Distress Syndrome"	Extremely Immature	Respiratory Distress Syndrome	4	222
Premature infant weights 1010 g with "Respiratory Distress Syndrome"	Immature	Respiratory Distress Syndrome	4	87
Premature infant weights 1010 g with "Newborn Respiratory Disease"	Immature	Newborn Respiratory Disease	Not an HIX HCC Diagnosis	Base Payment for Premature Infant



## Documentation and Coding Guidelines

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## Documentation and Coding Guidelines

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- Indicate the Primary / Principle Diagnosis (chiefly responsible for services provided)
- Document and report :
  - all coexisting conditions that require/affect patient treatment and/or management.
  - personal/family history if it impacts treatment
  - evaluation and/or treatment of all diagnoses
  - all diagnoses to the highest degree of specificity & certainty
  - cause-and-effect relationship of an underlying disease and its manifestation(s).



## SCAL Neonatology High Acuity HIX Conditions

## Neonatology High Acuity HIX Diagnoses

- **Selection criteria was based on:**

- low reporting rate in 2012
- high HIX severity level
- the need for standard clinical or coding definition



- **Five conditions were selected for training:**

Respirator Dependence	Severity 5
CHF	Severity 5
SIRS, Sepsis/Severe Sepsis, Septic Shock	Severity 4
Necrotizing Enterocolitis Stage 1	Severity 5
Protein-Calorie Malnutrition	Severity 2

## Respirator Dependence

### ■ Challenge:

- There are no clear-cut time frame set on what constitutes ventilator dependence.
- Coding Clinic stated: “this code should be reported when the patient requires continued ventilator support for an unexpected extended period of time and not for short –term acute phase of a condition. “
- High HIX severity level with a low reporting rate in 2012

ID	Name	Code
529528	RESPIRATOR DEPENDENCE	V46.11 ←
530739	RESPIRATOR DEPENDENCE DURING POWER FAILURE VISIT	V46.12

### ■ Our recommendation: define respiratory dependence as:

- Duration of care > 21 days
- Type of care: any combination of
  - HFNC  $\geq$  2 LPM, NCPAP, BIPAP, and/or NIPPV
  - Endotracheal CPAP, conventional ventilator care, or HFOV

# Congestive Heart Failure

- **Challenge:**

- High HIX severity level with a low reporting rate in 2012
- Need for a standard clinical or reporting definition

- **Our Recommendations: code CHF if:**

- **Patient has a reason for failure**

Examples:

- PDA (patent ductus arteriosus)
- Congenital Heart Disease (structural)
- Inadequate myocardial function (myopathies, metabolic, vascular, infectious, etc)

Match: <input type="text" value="congestive heart failure"/>		Find
Name	Code	
HYPERTENSIVE HEART DISEASE, W CHF (CONGESTIVE HEART FAILURE)	402.91,428.0	
CHF (CONGESTIVE HEART FAILURE)	428.0	

- **Objective Evidence of CHF or its treatment:**

Examples:

- |   |  |
|---|--|
| ▪ Symptomatic PDA                               | ▪ Elevated BNP   |
| ▪ Moderate or large PDA on echo                 | ▪ Restriction of fluids, dopamine, Lasix, indomethacin, PDA ligation |
| ▪ Chest x-ray with haziness and/or cardiomegaly |  |

# SIRS

## Challenge:

- High HIX severity level with a low reporting rate in 2012
- Need for a standard clinical or reporting definition

## Our recommendation: at least 3 of the following):

- Fever (temperature >38.5°C)
- Hypothermia (core temperature <36°C)
- Heart rate >180 bpm
- Tachypnea: >60 breaths/minute
- Lethargy
- Significant edema or positive fluid balance (>20 ml/kg over 24 h)
- Hyperglycemia (plasma glucose >180 mg/dL)
- Apnea > usual baseline

ID	Name	Code	
507238	SIRS DUE TO INFECTION W ACUTE ORGAN DYSFUNCTION	038.9, 995.92	← Severe sepsis w/acute organ dysfunction
507239	SIRS DUE TO INFECTION WO ORGAN DYSFUNCTION	038.9, 995.91	← Sepsis
537279	SIRS DUE TO NONINFECTIOUS PROCESS W ACUTE ORGAN FAILURE	995.94	← SIRS noninfectious w/acute organ failure
537259	SIRS DUE TO NONINFECTIOUS PROCESS WO ACUTE ORGAN FAILURE	995.93	← SIRS noninfectious w/o acute organ failure
523875	SIRS WO ORGAN DYSFUNCTION	995.90	← SIRS

# Sepsis

## Challenge:

- Might be incorrectly reported as SIRS or bacteremia
- Need for a standard clinical or reporting definition
- High HIX severity level with a low reporting rate in 2012

## Our recommendation: meets criteria if:

- The clinical syndrome defined by the presence of ***both*** infection and a systemic inflammatory response (SIRS).
- **Documentation needed:**
  - Documentation of SIRS
  - Documentation of Infection
- **Diagnostic Criteria - Infection:**
  - Confirmed or suspected:
  - Positive blood or CSF culture for a pathogenic organism
  - Negative blood culture but treatment with antibiotics for  $\geq 7$  days; no apparent infection at another site

Match: sepsis <span style="float: right;">Find</span>		
ID	Name	Code
533687	NEONATAL EARLY ONSET SEPSIS, ON OR BEFORE DAY 3	771.81
533689	NEONATAL LATE ONSET SEPSIS, AFTER DAY 3	771.81

**Note: Use additional codes to identify severe sepsis (995.92) and any associated acute organ dysfunction, if applicable**

# Severe Sepsis

## Challenge:

- Not frequently coded distinctly from “generic” sepsis
- Need for a standard clinical or reporting definition
- High HIX severity level with a low reporting rate in 2012

## Our recommendation: remember to distinguish

### Definition:

- Severe sepsis with acute organ dysfunction. 995.92

ID	Name	Code
535369	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION	038.9, 995.92
502822	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W ANAEROBIC SEPTICEMIA	038.3, 995.92
507967	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W COAGULASE NEGATIVE STAPH SEPTICEMIA	038.19, 995.92
502823	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W E COLI SEPTICEMIA	038.42, 995.92
502830	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W PSEUDOMONAS SEPTICEMIA	038.43, 995.92
502833	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W SERRATIA SEPTICEMIA	038.44, 995.92
502834	SEVERE SEPSIS W ACUTE ORGAN DYSFUNCTION, W STAPH SEPTICEMIA, FINAL ID PENDING	038.10, 995.92

**Note: Use additional codes specify acute organ dysfunction, such as septic shock 785.52**

### Documentation needed:

- Documentation of SIRS with infection (confirmed or suspected)
- Documentation of acute organ dysfunction

### Diagnostic Criteria - Organ Dysfunction:

- Arterial hypoxemia ( $\text{PaO}_2/\text{FiO}_2 < 300$ )
- Acute oliguria (urine output  $< 0.5$  ml/kg/hour)
- Creatinine  $> 1.5$  mg/dL
- Coagulation abnormalities (INR  $> 1.7$  or activated partial thromboplastin time  $> 60$  s)
- Ileus
- Thrombocytopenia (platelet count  $< 100,000/\mu\text{l}$ )

# Shock (Septic, Cardiogenic, Hypovolemic)

## Challenge:

- Not frequently coded distinctly from “generic” sepsis
- Need for a standard clinical or reporting definition
- High HIX severity level with a low reporting rate in 2012

## Our recommendation: remember to distinguish

### Definition:

- Shock is a complex syndrome of circulatory dysfunction associated with reduced oxygen and nutrient delivery to peripheral and ultimately to central organs. The etiology is multifactorial. Major classes of shock include cardiogenic, hypovolemic, and septic shock.

### Diagnostic Criteria:

- Hypotension
- Peripheral vasoconstriction

### Examples of Common Clinical Context:

- Feto-maternal hemorrhage (772.0-772.9)\*
- Vasa previa (663.50-663.53)\*
- Cord accidents/acute bleeding (663.00-663.93)\*
- Perinatal asphyxia (768.3-768.6, 768.9)\*
- ELBW infant (765.00-765.09)\*
- Chorioamnionitis (762.7)
- Severe sepsis (995.92)\*
- Unreplaced fluid losses

Match: shock

ID	Name	Code
516050	SHOCK	785.50
514444	CARDIOGENIC SHOCK	785.51
513215	HYPOVOLEMIC SHOCK	785.59
513213	SEPTIC SHOCK	785.52
502809	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W ANAEROBIC S	038.3, 995.92, 785.52
507968	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W COAGULASE I	038.19, 995.92, 785.52
502810	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W E COLI SEPTIC	038.42, 995.92, 785.52
507976	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W ENTEROCOCC	038.8, 995.92, 785.52
508008	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W GONOCOCCAI	098.89, 995.92, 785.52
502813	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W MENINGOCOCC	036.2, 995.92, 785.52
502853	SEPTIC SHOCK W ACUTE ORGAN DYSFUNCTION, W OTHER SEPTIC	038.8, 995.92, 785.52

\*Code range contains multiple HIX HCC codes

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# Stage 1 Necrotizing Enterocolitis in Newborn

## Challenge:

- Neonatologists are reluctant to report Stage 1 NEC
- HIX HCC reimbursement for NEC Stage 1 same as Stage 2 and 3.
- High HIX severity level with a low reporting rate in 2012

## Our recommendation: remember to diagnose

- **Stage 1 Suspected: 777.51**
  - Nonspecific systemic signs including lethargy, abdominal distention, and blood in stool. Radiology studies may be normal or positive for bowel dilation. Without pneumatosis, without perforation.
  - And treated with NPO and antibiotics for at least 5 days

ID	Name	Code
535608	NEONATAL NECROTIZING ENTEROCOLITIS	777.50
535730	NEONATAL NECROTIZING ENTEROCOLITIS, STAGE 1	777.51
535729	NEONATAL NECROTIZING ENTEROCOLITIS, STAGE 2	777.52
535728	NEONATAL NECROTIZING ENTEROCOLITIS, STAGE 3	777.53

# Malnutrition

## Challenge:

- High HIX severity level with a low reporting rate in 2012
- Need for a standard clinical and/or reporting definition

## Definition:

### a. AAP:

- Weight ( or weight for height) is less than 2 SD below mean for sex and age ( <3%ile ).
- Weight curve has crossed more than 2 percentile lines ON NCHS growth charts after having achieved a previously stable pattern.

### b. Z score to be -2

- Z score can be calculated from available excel sheets by CDC, link enclosed.

<http://www.cdc.gov/growthcharts/zscore.htm>

c. **Other References** : See Appendix for additional references and guidelines...

## Our Recommendation:

c. Go with 3% as it closely matches Z score of -2.

Reference: Pediatric Nutrition handbook By AAP, 5th edition , page 443-445

Preference List Matches		
Match:	Malnutrition	
		Find
Name	Code	Preference List
MALNUTRITION	263.9	SCAL APC DX

## Summary

- Physicians are the best person to represent the disease burden of the patient.
- Complete & Accurate documentation is the key to Quality patient care and Appropriate reimbursement.

**Document everything  
that the patient has  
and report what  
you document**



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## Frequently Asked Questions (FAQ)

### 1. What happens if I over code?

You should always document what you do and report what you document.

### 2. Will I received feedback on how well I am coding?

SCPMG Clinical Documentation and Audit Operations department will conduct on going audits for all physicians. Audit feedback reports will be provided to physicians on a monthly bases. 5-10 patients will be audited for each physician per month.

### 3. How much is each risk score?

We do not have the actual amount for the HIX risk score. However, the higher the risk score usually means the higher the reimbursement.

### 4. What's new and what are the changes to the current process?

There are no major changes to the current process. Just remember to document and report all diagnoses.

### 5. Who do I call if I have any questions?

See Contact List.

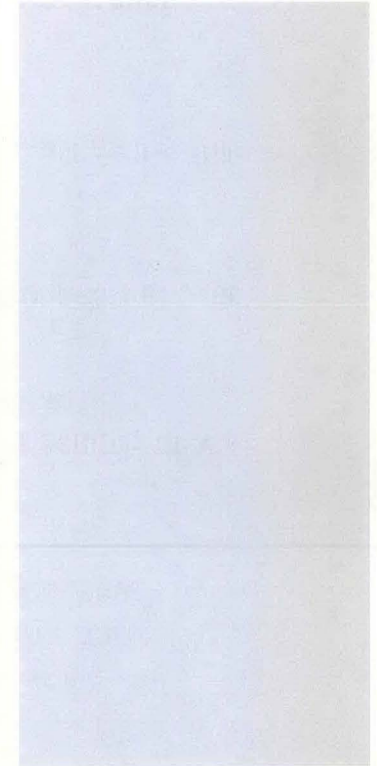
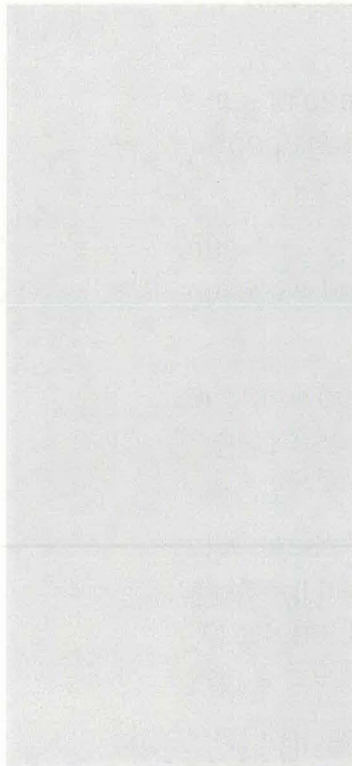
## Contact

- SCAL Neonatology Training Team:
  - **David Braun, MD**  
Regional Physician Coordinator, Perinatal Services  
(818) 719-2928
  - **Mandhir Gupta, MD**  
Physician Coordinator, Downey Medical Center  
(562) 461-6230
  - **Terri Ma, RHIA**  
Practice Specialist, Clinical Documentation and Audit Operations  
(626) 381-4326

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# Appendix

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# Malnutrition

## Helpful Hints:

1. Before any intervention make sure that the child is actually has failure to thrive, not “just small” Remember that 3-5 % of the healthy population, by definition, will be below the -2SD of the norm. (Your clues will be parental heights, proportionality, birth weight, gestational age, birth length and most importantly past trajectory.)
2. IUGR kids: if their birth length was normal expect “excellent” catch-up growth. They are actually at risk for future obesity. If birth length is also below the 5<sup>th</sup> percentile, they are likely to remain small.
3. One data point raises red flags. Diagnosis of FTT requires follow up (prospective or retrospective) over time.
4. A good start as a f/u interval is Qweek or Q2w weight-checks. You can gradually increase it as the child starts to catch up.
5. The requirements should be individualized as soon as possible. The guidelines are for populations. Remember the bell curve. There is a huge distance between two tails of it and what is appropriate for one half of the population is too much or too little for the other half.

SIS

# Malnutrition

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## Helpful Hints:

6. Your job in the clinic is not to teach “nutrition 101”. The caregiver is not interested in learning what works for the average x-year-old. They are there, mostly because what works for the average child has not worked for this little one.
7. Remember: siblings are NOT controls. Do not rule out abuse or neglect just because other sibs are fine. It is typical for only one of the children to have FTT due to neglect.
8. Use the appropriate charts. Especially for special medical conditions and 1<sup>st</sup> generation immigrants. But, it is always better to use them together w/ the CDC charts.
9. As you all know, HISTORY is the most important part of the evaluation.
10. Was the pregnancy planned? It may be useful in uncovering attachment problems, but difficult to ask directly. I find it easier to ask “How long into the pregnancy did you find out that you were pregnant?” Mothers usually volunteer information if they did not want the child.

# Malnutrition

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## Helpful Hints:

11. Genetics referrals can be helpful, to adjust expectations and setting realistic goals, if nothing else.
12. There is no “FTT Battery” of labs. Send your CBC and CMP, but everything else should depend on indications.
13. Observe at least one feeding. There is a validated scale (NCAST) to score feeding interaction.
14. Collaborate w/ speech closely. Most of “preferences” or “dislikes” are based on oromotor problems (or sometimes intolerances)
15. The absolute threshold for referral is developmental delay. (By the way, developmental delay is a very unfortunate euphorism. The correct term should be “developmental loss”)

# Malnutrition

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## Helpful Hints:

16. The minimal catch up growth is around 10 gms/day. 15 gm/day is a realistic expectation. Be happy w/ 20 gm/day. Celebrate at 30 gm/day.
17. the nutrition support sequence is : 3 meals+2 snacks → supplements → tube feeding → TPN Tube feeding is either NG, NJ or G-tube. There is no reason under the sun to feed a child with a NG tube for more than 4-6 weeks.
18. FTT etiologies can be divided into three groups: Organic, inorganic and mixed. “Mixed” constitutes 99.9% of the total, making the grouping absolutely meaningless.
19. “psychosocial etiology” and “environmental reasons” do NOT imply neglect – no matter how much DCFS workers wish that they do.
20. Make sure that the family has the resources and the skills to follow recommendations and confirm who the caregiver is before going ahead with interventions.

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# Malnutrition

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## Helpful Hints:

21. Make sure all eligible patients sign up w/ WIC, Food Stamps.
22. Think twice before giving waiver letters to mothers for FTT. Rare, but very unfortunately, there are some cases where these letters cause a conflict of interest.
23. If in doubt and wish to discuss FTT cases, call me anytime.

# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

	<b>Mild Malnutrition</b>	<b>Moderate Malnutrition</b>	<b>Severe Malnutrition</b>
Percent Ideal Body Weight	80-90%	70-79%	< 70%
Percent of Usual Body Weight	90-95%	80-89%	< 80%
Albumin (g/dL)	2.8-3.4	2.1-2.7	< 2.1
Transferrin (mg/dL)	150 - 200	100 - 149	< 100
Total Lymphocyte Count (per $\mu$ L)	1200 - 2000	800 - 1199	< 800

# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

**Gomez Classification:** The child's weight is compared to that of a normal child (50th percentile) of the same age. It is useful for population screening and public health evaluations.

$\text{percent of reference weight for age} = ((\text{patient weight}) / (\text{weight of normal child of same age})) * 100$

percent of reference weight for age	Interpretation
90 - 110%	normal
75 - 89%	Grade I: mild malnutrition
60 - 74%	Grade II: moderate malnutrition
< 60%	Grade III: severe malnutrition

# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

**Wellcome Classification:** evaluates the child for edema and with the Gomez classification system.



Weight for Age (Gomez)	With Edema	Without Edema
60-80%	kwashiorkor	undernutrition
< 60%	marasmic-kwashiorkor	marasmus



# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

**Waterlow Classification:** Chronic malnutrition results in stunting. Malnutrition also affects the child's body proportions eventually resulting in body wastage.

percent weight for height = ((weight of patient) / (weight of a normal child of the same height)) \*

100percent height for age = ((height of patient) / (height of a normal child of the same age)) \* 100

	Weight for Height (wasting)	Height for Age (stunting)
Normal	> 90	> 95
Mild	80 - 90	90 - 95
Moderate	70 - 80	85 - 90
Severe	< 70	< 85

# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

**Serum Albumin:** considered to be the single best nutritional test to predict patient outcome. breakpoint for clinically relevant malnutrition: ranges from 3.0 to 3.5 g/dL

Level of Malnutrition	Albumin g/dL
normal	3.5 - 4.8
mild	2.8 - 3.4
moderate	2.1 - 2.7
severe	< 2.1

**Instant Nutritional Assessment:** uses measurements of serum albumin and total lymphocyte counts at admission to evaluate the patient's nutritional status.

Serum Albumin	Total Lymphocyte Count	Complications	Death
$\geq 3.5$ g/dL	$\geq 1500$ per $\mu$ L	3.0%	0.9%
$\geq 3.5$ g/dL	< 1500 per $\mu$ L	7.5%	2.2%
< 3.5 g/dL	$\geq 1500$ per $\mu$ L	23.8%	0%
< 3.5 g/dL	< 1500 per $\mu$ L	11.8%	17.6%

# Malnutrition

## CLASSIFICATION OF MALNUTRITION IN CHILDREN :

**Nutritional Needs:** A simple rules of thumb: typical formula and breast milk are 20 kcal/oz

Group	Particulars	Body WtKg	Net energy kcal/d	Protein g/d	Fat g/d	Calcium mg/d	Iron mg/d	Vit.A. µg/d retinol	Vit.A. µg/d β- carotene
Infants	0-6 months	5.4	108/kg	2.05/kg		500			
	6-12 months	8.6	98/kg	1.65/kg				350	1200
Children	1-3 years	12.2	1240	22	25	400	12	400	1600
	4-6years	19.0	1690	30	25	400	18	400	
	7-9 years	26.9	1950	41	25	400	26	600	2400
Boys	10-12 years	35.4	2190	54	22	600	34	600	2400
Girls	10-12 years	31.5	1970	57			19		

Up to 5 years of age begin with a base of 1,000 calories and add 100 calories for each year. (e.g. a **1 year-old** would need approximately **1000 + 100 calories= 1100 calories/day**, a **2 year-old** would need **1000 + 200 calories= 1200 calories/day**.)

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# **EXHIBIT 25**



*venty factors*

Measurement	CY 2014	CY 2015	YTD 2015-04	YTD 2016-04	YOY YTD Increase	% of YOY YTD Increase
Continuous KP MA Member	442,242	467,350	490,046	513,401	23,355	4.8%
HCC Annual Revenue Weight	12,204	12,073	12,073	12,073	0	0.0%
Count	1,276	1,380	1,147	1,189	42	3.7%
Rates per 10K	28.9	29.5	23.4	23.2	0	-1.1%
Risk Score Contribution	0.004	0.004	0.004	0.004	0.000	-1.1%
Estimate Revenue Contribution (in 000's)	15,573	16,661	13,848	14,355	507	3.7%

<b>Coefficient</b>	1.520
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NCAL Freq/count of HCC 82 = 1380, with \$12,073 estimated \$ value for yr; 1380 X12,073 annual value = \$16,661,000.

HCC 82 includes Vent Dependence Status ICD-10-CM code

1	Billing System	Regi	Encounter ID	Date	Service Setting	Guarantor Acct	HAR ID	Primary Payor Name	Patient MRN	Diagnosis
2	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
4	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
10	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
13	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
16	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
17	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
19	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
21	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
26	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
30	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
34	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
36	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
37	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
39	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
42	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
51	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
52	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
57	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
58	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
59	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
60	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
61	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
63	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
64	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
65	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
66	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
73	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
75	HB	NC	?	?	?	?	?	KP MEDICARE	?	V46.11 - DEPENDENCE ON RESPIRATOR STATUS

Data report on the Frequency of Vent Status Codes in all setting and in all regions (see tabs). Sorted by Payer: only KP Medicare (MA) or Sr Adv.; Billing System identifies Hosp based encounter (HB) or ProFee/Physician based encounter (PB). Encounter ID is the account # and Guarantor Acct is \_\_ and HAR ID \_\_\_\_\_ and Pat MRN is the Med Record #.

A	B	C	D	E	F	G	H	I	J	K	L	M
161	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
162	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
163	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
169	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
170	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
172	PB	NC	REDACTED	REDACTED	Office	REDACTED		KP MEDICARE	REDACTED	V46.11 - HOME VENTILATION DEPENDENCE		
173	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
174	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
177	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
178	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
179	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
181	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
186	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
187	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
189	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
194	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
195	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
196	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
200	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
201	PB	NC	REDACTED	REDACTED	Office	REDACTED		KP MEDICARE	REDACTED	V46.11 - PERSONAL CONDITION OF RESPIRATORY DEPENDENCE.		
202	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
206	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
210	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
215	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
217	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
221	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
222	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
223	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
226	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
227	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		

Identified PB and hi-lighted in light purple color. For NCAL only four PB encounters coding of Vent in year 2010 and only nine in 2011... but...

	A	B	C	D	E	F	G	H	I	J	K	L
	Billing System	Regi	Encounter	Date	Disch/Svc	Service Setting	Guarantor Account	HAR ID	Primary Payor Name	Patient MRN	Diagnosis	
934	HB	NC	REDACTED	REDACTED	D	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
936	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
938	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
939	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
940	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
942	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
943	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
944	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
945	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
946	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
947	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
948	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
951	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
952	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
953	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
957	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
958	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
959	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
960	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
961	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
962	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
963	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
964	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
965	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
966	PB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
971	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
972	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
973	HB	NC	REDACTED	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	

In 2012 the PB setting began to assign (pick the Dx) of vent dependence status more frequently. Some of the Dx were selected for a physician inpatient visit (bedside). The HB Dx is at the time of discharge.

A	B	C	D	E	F	G	H	I	J	K	L
1155	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1156	HB	NC	REDACTED	D	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1158	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1159	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1160	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1161	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1162	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1163	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1166	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1167	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1168	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1169	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1172	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1173	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1176	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1177	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1179	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1185	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1186	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1188	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1189	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1191	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1192	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1197	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1198	HB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1199	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1202	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1203	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1206	HB	NC	REDACTED		?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
1207	PB	NC	REDACTED		Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	

Here you see the inpatient hospital encounter with PB coding of vent dependence status. But....

A	B	C	D	E	F	G	H	I	J	K	L	M
1092	PB	NC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1097	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1098	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1099	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1100	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1101	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1102	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1103	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1104	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1105	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1107	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1108	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1109	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1110	PB	NC	REDACTED	ED	Office	REDACTED		KP MEDICARE	REDACTED	V46.11 - PERSONAL CONDITION OF RESPIRATORY DEPENDENCE.		
1111	PB	NC	REDACTED	ED	Office	REDACTED		KP MEDICARE	REDACTED	V46.11 - RESPIRATOR DEPENDENCE		
1112	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1113	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1114	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1115	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1116	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1117	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1118	HB	NC	REDACTED	ED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1119	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1120	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1121	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1122	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1123	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1125	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1126	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		
1127	PB	NC	REDACTED	ED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS		



SAME Med Rec #, same patient

Here you see in yellow the PB hospital encounters all with the Vent Dependence status code assigned BUT the HB has not assigned that code. 2012 Regions were discussing the capture of vent status code, esp NCAL and SCAL. HIM Coding provided guidance and directions but Med Groups and Regions continued to pressure and push to capture this code.

	Billing		Disch/Svc					Primary Payor		
1	System	Regi	Encounter I.	Date	Service Setting	Guarantor Account	HAR ID	Name	Patient MRN	Diagnosis
2100	HB	NC	REDACTED	REDACTED	?		REDACTED	KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2102	PB	NC		D	Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2104	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2105	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2108	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2110	PB	NC			Office			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2111	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2113	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2115	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2118	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2119	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2120	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2122	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2125	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2128	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2131	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2132	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2138	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2139	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2140	PB	NC			Office			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2141	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2143	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2144	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2145	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2148	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2149	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2150	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS
2153	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS

Here you see the Hospital assigning the Vent status code and also assigned by the PB side on the same day.

A	B	C	D	E	F	G	H	I	J	K	L
2102	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2104	PB	NC		ED	Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2105	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2108	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2110	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2111	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2113	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2115	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2118	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2119	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2120	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2124	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2127	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2130	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2131	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2137	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2138	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2139	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2140	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2142	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2143	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2144	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2147	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2148	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2149	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2152	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2153	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2154	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2157	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2158	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2159	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2160	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2162	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	

Notice the PB encounters in a series for the same patient, same hospitalization, several days in a row. What is noteworthy is there isn't a HB code assignment for the patient (MRN) – which leads you to believe that the patient did NOT leave the hospital on a vent. Which would result in the Vent dependence status code being assigned.

A	B	C	D	E	F	G	H	I	J	K	L
2147	PB	NC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2148	PB	NC		D	Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2149	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2152	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2153	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2154	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2157	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2158	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2159	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2160	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2162	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2166	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2167	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2169	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2173	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2174	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2175	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2177	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2179	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2181	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2182	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2186	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2188	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2189	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2191	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2193	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2194	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2195	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2197	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2198	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2199	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2200	PB	NC			Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2201	HB	NC			?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	

Two patients in the hospital and there is NO HB coding of Vent Dependence status, only PB.

A	B	C	D	E	F	G	H	I	J	K	L
2413	PB	NC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	REDACTED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2415	HB	NC	REDACTED	ED	?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2416	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2418	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2419	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2420	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2424	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2425	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2426	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2430	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2432	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2433	HB	NC	REDACTED		?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2434	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2435	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2437	HB	NC	REDACTED		?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2438	HB	NC	REDACTED		?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2439	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2440	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2442	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2447	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2450	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2451	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2454	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2455	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2456	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2457	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2459	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2460	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2465	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2466	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2473	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2474	PB	NC	REDACTED		Inpatient Hospital			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	
2475	HB	NC	REDACTED		?			KP MEDICARE		V46.11 - DEPENDENCE ON RESPIRATOR STATUS	

PB hospital encounters without HB code assignment.

PB hospital encounters without HB code assignment.

PB hospital encounters without HB code assignment.

PB hospital encounters without HB code assignment.

These appear to be Physician assigned codes (Epic Dx Pick List), no HB code assignment from coding staff. Most likely Dx code selection and HCC errors.

Billing		Regi		Encounter I	Disch / Sw / Dis	Service Settli	Account	HAR ID	Primary Payor Nam	Diagnosis	Disch	Disch_Dis	Disch_Dis	Length
System	Regi	Encounter I	Disch / Sw / Dis	Service Settli	Account	HAR ID	Primary Payor Nam	Diagnosis	Disch	Disch_Dis	Disch_Dis	Disch_Dis	Length	
1	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	5	
2	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1003	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	24	
3	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	13	
4	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	3	
5	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	6	
6	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	9	
7	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1003	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	10	
8	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
9	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	28	
10	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facil	52	
11	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	15	
12	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	50	
13	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	4	
14	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	66	
15	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	26	
16	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	26	
17	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
18	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	109	
19	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	591	
20	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	64	Discharged/transferred to a nursing facility certified under	67	
21	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	6	
22	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital fo	83	
23	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	35	
24	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	708	
25	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	6	
26	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	62	
27	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	LIBERTY MUTUAL INSL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	10	
28	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	LIBERTY MUTUAL INSL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	10	
29	HB	NC	REDACTED	REDACTED	?	?	REDACTED	?	LIBERTY MUTUAL INSL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) wi	10	

This NCAL Hospital encounters (4 Hospital Regions) ONLY report sort shows the Length of Stay (LOS) and Discharge Disposition (where the patient was sent after discharge from the acute care hospital). Those going to Home after discharge are suspect. Those with LOS below 6 days are also suspect. Per MD Pulm expert(Dr Wm Haik), even going to Home Health with vent would be unusual. Continued to next slide...

	A	B	C	D	E	F	G	H	I	J	K	L	M
	System	Regi	Encounter I	Disch/Svc Da	Service Settl	Account	HAR ID	Primary Payor Nam	Diagnosis	Disch	Disch_Dis	Disch_Dis	Length
1	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
4	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
10	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facili	1	
13	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
16	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
17	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital fo	1	
19	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
21	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
26	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
30	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
34	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
36	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
37	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
39	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	1	
42	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
51	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
52	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
57	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
58	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
59	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
60	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
61	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
63	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
64	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
65	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
66	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
69	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
73	HB	NC	REDACTED	REDACTED	?	REDACTED	?	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	

NCAL sorted payer of KP Medicare or Medicare Adv; Sorted by MRN is smallest to largest number; sorted by LOS (days with smallest days to largest /longest).

Billing		Guarantor				Diagnosis		Disch		Length
System	Regi	Encounter I	Disch/Svc Da	Service Setti	Account	HAR ID	Primary Payor Nan	Disp	Disch_Displ Name	of_Sta
1	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
2	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
4	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
13	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
16	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
19	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
21	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
26	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
30	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
34	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
36	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
37	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
42	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
51	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
52	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
57	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
58	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
59	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
60	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
61	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
63	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
64	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
65	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
66	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
69	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
73	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
75	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - PERSONAL CONDITION OF RESPIRATORY	1 Discharged to home or self care (routine discharge)	1
81	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
84	HB	NC	REDACTED	REDACTED	?	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1

Additional "Sort" on Disch Disposition to Home (1) and to Home Health (6) and "Sort" of the Disch/Date, starting with 2010 going down to 2016..

1	System	Regio	Encounter ID	Disch/Svc Da	Service Setti	Account	HAR ID	Primary Payor Nam	Diagnosis	Disch Disp	Disch_Displ	Length of Sta
2	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
4	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
13	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
16	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
20	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
25	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
29	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
33	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
35	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
36	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
41	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
50	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
51	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
56	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
57	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
58	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
59	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
61	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
62	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
63	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
64	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
67	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
72	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - PERSONAL CONDITION OF RESPIRATORY	1	Discharged to home or self care (routine discharge)	1
78	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
81	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
82	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
85	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
86	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1

2010 NCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 7  
 2011 NCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 12







A	B	C	D	E	F	G	H	I	J	K	L	M	N
233	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
234	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
241	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
246	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
249	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
250	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
251	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
252	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
255	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
256	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
257	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
258	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
260	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
263	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
265	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
266	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
267	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
270	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
271	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
278	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
280	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
284	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
285	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
286	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
291	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
302	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
313	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
316	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	6	Discharged/transferred to home under care of an organize	1	
318	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
320	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	

2015 NCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 17

A	B	C	D	E	F	G	H	I	J	K	L	M
263	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
265	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
266	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
267	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
270	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
271	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
278	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
280	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
284	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
285	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
286	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
291	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
302	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
313	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
316	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	6	Discharged/transferred to home under care of an organize	1
318	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
320	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
321	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
322	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1
332	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	2
344	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
345	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	2
347	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
348	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
350	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
353	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
356	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organize	2
357	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
358	HB	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
359	HR	NC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2

2016 NCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 12

Southern California HCC Risk Scores Trends by HCC (Part C - 2014 Model)						
As of May 21, 2016 extract						
Select Region	Southern California		82 - Respirator Dependence/Tracheostomy Statu		Coefficient 1.520	
Measurement	CY 2014	CY 2015	YTD 2015.04	YTD 2016.04	YOY YTD Increase	% of YOY YTD Increase
Continuous KP MA Member	436,576	468,084	488,246	514,104	25,858	5.3%
HCC Annual Revenue Weight	10.847	11,244	11,244	11,244	0	0.0%
Count	1,062	1,171	1,031	1,133	102	9.9%
Rates per 10K	24.3	25.0	21.1	22.0	1	4.4%
Risk Score Contribution	0.004	0.004	0.003	0.003	0.000	4.4%
Estimate Revenue Contribution (in 000's)	11,519	13,167	11,593	12,740	1,147	9.9%



NCAL Freq/count of HCC 82 = 1171, with \$11244 estimated \$ value for yr; 1171 X 11,244 annual value = \$13,167,000.

HCC 82 includes Vent Dependence Status ICD-10-CM code

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Billing System	Regio n	Encounter I	Date	Disch/Svc	Service Setting	Guarantor Account	HAR ID	Primary Payor Name	Diagnosis	Disch Disp	Disch Disp Name	Length of Stz	
1	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
5	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
6	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
7	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
10	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
11	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
13	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
14	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
16	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
19	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
21	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
22	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
23	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
24	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
25	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
26	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
27	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
28	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
29	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
31	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
32	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
38	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
42	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
43	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
44	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
48	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
50	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
51	HR	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	

2010 SCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 5  
 2011 SCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 8

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Billing System	Regio n	Encounter ID	Date	Disch/Svc	Service Setting	Guarantor Account	HAR ID	Primary Payor Name	Diagnosis	Disch Dis	Disch_Displ Name	Length of Stay	
1	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
5	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
6	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
9	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
10	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
12	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
14	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
17	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
19	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
20	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
21	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
22	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
23	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
24	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
25	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
27	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
33	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
37	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
38	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
42	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
44	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
45	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
46	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
47	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
48	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
49	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
50	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
51	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED	REDACTED	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	

2012 SCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 7





A	B	C	D	E	F	G	H	I	J	K	L	M	N
90	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an org	1	
91	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
93	HB	SC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
94	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
97	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
100	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
103	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
105	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
106	HB	SC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
107	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
108	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
109	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
110	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
113	HB	SC	REDACTED	REDACTED	Office	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
114	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
119	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
121	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
122	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
123	HB	SC	REDACTED	REDACTED	Office	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
125	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
126	HB	SC	REDACTED	REDACTED	?	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1	
127	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
129	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
130	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
134	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
135	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
137	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
138	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
141	HB	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	
142	HR	SC	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILAT	1	Discharged to home or self care (routine discharge)	1	

2015 SCAL Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 29



	Billing System	Regi	Encounter	Disch/Svc Da	Service Setting	Guarantor Account	HAR ID	Primary Payor Name	Diagnosis	Disch_ Disp	Disch_Displ Name	Length_of Stay
14	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	63
19	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	9
38	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi;	31
41	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	7
45	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	15
49	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi;	17
61	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi;	15
71	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	83
72	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
91	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi;	78
99	HB	HI	REDACTED	REDACTED	Inpatient Hospital	REDACTED		KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	4
205												
206												
207												
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215												
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219												
220												
221												

2010-2016 HI Region Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 1

1	System	Regi	Encounter I	Disc/Svc Da	Service Setting	Guarantor Acct	HAR ID	Name	Diagnosis	Disch	Disch_Disp_Name	Length_of_Stay
5	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
6	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
7	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
8	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
9	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
11	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
12	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	1
13	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	1
16	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
22	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
25	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
26	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
27	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
28	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
29	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	2
30	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	2
31	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	3
32	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	3
34	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	3
35	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi	4
39	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi	4
45	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi	4
46	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi	4
51	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organi	4
52	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	4
63	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	6	Discharged/transferred to home under care of an organi	4
64	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	4
69	HB	NW	REDACTED	REDACTED	Inpatient Hospital	REDACTED		SR ADVNTG	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILA	1	Discharged to home or self care (routine discharge)	4

2010-2016 HI Region Vent LOS = 1 day and Disch Disp = Home or HH; Total encounters/cases = 8

# **EXHIBIT 26**





HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	8
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	12
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	12
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20	Expired	22
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20	Expired	22
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN V46.11 - DEPENDENCE ON RESPIRATOR STATUS	63	Discharged/transferred to a Medicare Certified Long Term Care Hosp	25
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20	Expired	69
HB	NC	REDACTED	REDACTED	CONTRA COSTA HLTH PLAN Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20	Expired	69
HB	NC	REDACTED	REDACTED	DEPT OF VETERANS AFFAIRS V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	58
HB	NC	REDACTED	REDACTED	FARMERS INSURANCE GROL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	29
HB	NC	REDACTED	REDACTED	FARMERS INSURANCE GROL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	29
HB	NC	REDACTED	REDACTED	HEALTH NET COMMERCIAL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70	Discharge/transfer to another type of health care institution not defini	3
HB	NC	REDACTED	REDACTED	HEALTH NET COMMERCIAL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	25
HB	NC	REDACTED	REDACTED	HEALTH NET MEDI-CAL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	10
HB	NC	REDACTED	REDACTED	HEALTH NET MEDI-CAL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	49
HB	NC	REDACTED	REDACTED	HEALTH NET MEDI-CAL V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	54
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	3
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	3
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	7
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	64	Discharged/transferred to a nursing facility certified under Medicaid	35
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	64	Discharged/transferred to a nursing facility certified under Medicaid	35
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facility (IRF) inc	46
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	13
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facility (IRF) inc	29
HB	NC	REDACTED	REDACTED	HEALTH PLAN OF SAN MATE V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facility (IRF) inc	29
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	KFHP 1000 V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1





















HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	18
HB	NC	REDACTED	KFHP 1000	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	18
HB	NC	REDACTED	KFHP 1000	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) STATUS	6 Discharged/transferred to home under care of an organized home health agency	18
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	19
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	19
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	19
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	51 Hospice - medical facility (Certified) Providing Hospice Level of Care	19
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70 Discharge/transfer to another type of health care institution not defined	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	50 Hospice - home	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	20
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	21
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62 Discharged/transferred to an inpatient rehabilitation facility (IRF) including	21
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	21
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	21
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	4 Discharged/transferred to a Facility that Provides Custodial or Supportive	21
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	22
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	22
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	22
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	22
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	22
HB	NC	REDACTED	KFHP 1000	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	22
HB	NC	REDACTED	KFHP 1000	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	22
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62 Discharged/transferred to an inpatient rehabilitation facility (IRF) including	23
HB	NC	REDACTED	KFHP 1000	Z99.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	23
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70 Discharge/transfer to another type of health care institution not defined	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70 Discharge/transfer to another type of health care institution not defined	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	24
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62 Discharged/transferred to an inpatient rehabilitation facility (IRF) including	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicaid	25
HB	NC	REDACTED	KFHP 1000	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	25







































































HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	4 Discharged/transferred to a Facility that Provides Custodial or Supp	119
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	122
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	122
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home h	126
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	126
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	126
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	126
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70 Discharge/transfer to another type of health care institution not defi	127
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70 Discharge/transfer to another type of health care institution not defi	132
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home h	132
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	134
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	136
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	6 Discharged/transferred to home under care of an organized home h	136
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	138
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	138
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	139
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	64 Discharged/transferred to a nursing facility certified under Medicaid	139
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	148
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	152
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	152
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	154
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	154
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	155
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	155
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	51 Hospice - medical facility (Certified) Providing Hospice Level of Care	155
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	156
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Admitted as an inpatient to this hospital	158
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home h	158
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	158
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	158
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	161
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	168
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	178
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	179
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home h	183
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	186
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20 Expired	194
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20 Expired	195
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	211
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	214
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	215
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home h	225
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	228
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	232
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	233
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	244
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	245
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	251
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	279
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	279
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	281
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	282
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	285
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	285
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	70 Discharge/transfer to another type of health care institution not defi	290
HB	NC	REDACTED	REDACTED	7	KP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	308

HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20	Expired	333
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	331
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	333
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	50	Hospice - home	342
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	346
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organized home h	399
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	406
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	406
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	435
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70	Discharge/transfer to another type of health care institution not defi	443
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organized home h	445
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	457
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	492
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	507
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	638
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	736
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	801
HB	NC	REDACTED	?	XP MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	984
HB	NC	REDACTED	?	XPIC/HARRINGTON	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	8
HB	NC	REDACTED	?	XPIC/HARRINGTON	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	8
HB	NC	REDACTED	?	XPIC/HARRINGTON	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	11
HB	NC	REDACTED	?	LIBERTY MUTUAL INSURANC	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	10
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	1
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	1
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	70	Discharge/transfer to another type of health care institution not defi	1
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	1
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	63	Discharged/transferred to a Medicare Certified Long Term Care Hosp	2
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	63	Discharged/transferred to a Medicare Certified Long Term Care Hosp	2
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	2
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	2
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	2
HB	NC	REDACTED	?	MEDI-CAL EDS	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	1	Discharged to home or self care (routine discharge)	2
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	3
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organized home h	3
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	3
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	4
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	9	Admitted as an inpatient to this hospital	4
HB	NC	REDACTED	?	MEDI-CAL EDS	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	4
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	66	Discharged/transferred to a Critical Access Hospital (CAH)	5
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	5
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	6
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	7
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	7
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	7
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	7
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	7
HB	NC	REDACTED	?	MEDI-CAL EDS	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	7
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	8
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	8
HB	NC	REDACTED	?	MEDI-CAL EDS	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1	Discharged to home or self care (routine discharge)	8











HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	36
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	36
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	37
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	38
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	38
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	42
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	43
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	43
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	43
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	46
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	6 Discharged/transferred to home under care of an organized home health agency	46
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	6 Discharged/transferred to home under care of an organized home health agency	46
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	47
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	63 Discharged/transferred to a Medicare Certified Long Term Care Hospital	47
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	64 Discharged/transferred to a nursing facility certified under Medicaid	49
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	49
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	1 Discharged to home or self care (routine discharge)	49
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	50
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	51
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	55
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	63
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	70
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	75
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	76
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	79
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	82
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6 Discharged/transferred to home under care of an organized home health agency	82
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	85
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	111
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	137
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	137
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	161
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	169
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	194
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	217
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	240
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	266
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	9 Admitted as an inpatient to this hospital	277
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	297
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	297
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2 Discharged/transferred to a short-term general hospital for inpatient	301
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	20 Expired	316
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	318
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	9 Admitted as an inpatient to this hospital	412
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	469
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	63 Discharged/transferred to a Medicare Certified Long Term Care Hospital	517
HB	NC	REDACTED	REDACTED	MEDICARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	30 Still patient	602
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	70 Discharge/transfer to another type of health care institution not defined	919
HB	NC	REDACTED	REDACTED	MEDICARE	299.11 - DEPENDENCE ON RESPIRATOR (VENTILATOR) ST/	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	1655
HB	NC	REDACTED	REDACTED	MEDICARE HMO OTHER	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20 Expired	6
HB	NC	REDACTED	REDACTED	MEDICARE HMO OTHER	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	17
HB	NC	REDACTED	REDACTED	MEDICARE HMO OTHER	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	17
HB	NC	REDACTED	REDACTED	MOLINA HEALTHCARE (MED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	4
HB	NC	REDACTED	REDACTED	MOLINA HEALTHCARE (MED	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	27
HB	NC	REDACTED	REDACTED	PARTNERSHIP HEALTH PLAN	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	1 Discharged to home or self care (routine discharge)	1
HB	NC	REDACTED	REDACTED	PARTNERSHIP HEALTH PLAN	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3 Discharged/transferred to Skilled Nursing Facility (SNF) with Medicare	7



HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organized home ho	13
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	6	Discharged/transferred to home under care of an organized home ho	13
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	17
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE	Z99.11 - DEPENDENCE ON RESPIRATOR [VENTILATOR] STA	20	Expired	24
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE	Z99.11 - DEPENDENCE ON RESPIRATOR [VENTILATOR] STA	20	Expired	24
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE-MEDI	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	5
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE-MEDI	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	5
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE-MEDI	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	27
HB	VC	REDACTED	REDACTED	REDACTED	UNITED HEALTHCARE-MEDI	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	27
HB	VC	REDACTED	REDACTED	REDACTED	VA BENEFITS PALO ALTO	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	157
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP NCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	13
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP NCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	62	Discharged/transferred to an inpatient rehabilitation facility (IRF) Inc	32
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	6
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	6
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	8
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	20	Expired	8
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	16
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	16
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	16
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	63
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	3	Discharged/transferred to Skilled Nursing Facility (SNF) with Medicar	63
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	480
HB	VC	REDACTED	REDACTED	REDACTED	VST MBR KP SCAL	V46.11 - DEPENDENCE ON RESPIRATOR STATUS	2	Discharged/transferred to a short-term general hospital for inpatient	480

# **EXHIBIT 27**

On Thursday, December 26, 2013 3:57 PM, "[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)" <[Gloryanne.H.Bryant@kp.org](mailto:Gloryanne.H.Bryant@kp.org)> wrote:

▼ Victoria M Hernandez

----- Original Message -----

**From:** Victoria M Hernandez  
**Sent:** 12/26/2013 03:27 PM PST  
**To:** Gloryanne Bryant  
**Subject:** Fw: TPMG Vent Audit Results

FYI

**VICTORIA M. HERNANDEZ, RHIA, CCS, CDIP, CRCR, AHIMA-Approved ICD-10-CM/PCS Trainer**

Regional Associate Director of Hospital Coding, Northern California

NCAL Revenue Cycle HIM

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Facsimile: (510) 625-5701

Email: [Victoria.M.Hernandez@kp.org](mailto:Victoria.M.Hernandez@kp.org)

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**HIM page:** <https://wiki.kp.org/wiki/x/fYDGBQ>

**Coders' Corner:** <https://wiki.kp.org/wiki/x/q4DGBQ>

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----- Forwarded by Victoria M Hernandez/CA/KAIPERM on 12/26/2013 03:27 PM -----

From: Victoria M Hernandez/CA/KAIPERM  
To: Roderick C Madamba/CA/KAIPERM@KAIPERM  
Date: 12/26/2013 03:26 PM  
Subject: TPMG Vent Audit Results

---

Hi Rod,

I had Loren and Ronda validate the coding from the TPMG vent audit cases and they disagreed with 100% of their recommendation. I'll keep this on file until we officially hear back from Coding Clinic. Thanks.

*(See attached file: V4611 Vent Dependence Jan 1 to Aug 31 2013.xls)*

**VICTORIA M. HERNANDEZ, RHIA, CCS, CDIP, CRCR, AHIMA-Approved ICD-10-CM/PCS Trainer**

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Coders' Corner: <https://wiki.kp.org/wiki/x/q4DGBQ>

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	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
3		REDACTED				
4						
5				V46.11	DEPENDENCE ON RESPIRATOR STATUS	266,537.60
6						
7				V46.11	DEPENDENCE ON RESPIRATOR STATUS	19,435.95
8						
9				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,121.00
10						
11				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,662.45
12						
13				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,410.45
14						
15				V46.11	DEPENDENCE ON RESPIRATOR STATUS	36,637.85
16						
17				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,591.75
18						
19				V46.11	DEPENDENCE ON RESPIRATOR STATUS	24,209.05
20						
21				V46.11	DEPENDENCE ON RESPIRATOR STATUS	68,857.05
22						
23				V46.11	DEPENDENCE ON RESPIRATOR STATUS	92,591.00
24						
25				V46.11	DEPENDENCE ON RESPIRATOR STATUS	708,741.72
26						
27				V46.11	DEPENDENCE ON RESPIRATOR STATUS	191,813.35
28						
29				V46.11	DEPENDENCE ON RESPIRATOR STATUS	209,149.80
30						
31				V46.11	DEPENDENCE ON RESPIRATOR STATUS	470,652.25
32						

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
3			REDACTED					REDACTED
4								
5	13	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
6								
7	8	Inpatient			Medicare Unassigned	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
8								
9	2	Emergency			Medicare Advantage	UNK	Unknown DRG	
10								
11	6	Emergency			KP Medicaid	UNK	Unknown DRG	
12								
13	7	Emergency			KP Traditional	UNK	Unknown DRG	
14								
15	3	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
16								
17	6	Emergency			Medicare Advantage	UNK	Unknown DRG	
18								
19	5	Observation			KP Traditional	UNK	Unknown DRG	
20								
21	4	Inpatient			Medicare Advantage	689	KIDNEY & URINARY TRACT INFECTIONS W MCC	
22								
23	3	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
24								
25	18	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
26								
27	5	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
28								
29	12	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
30								
31	16	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
32								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
3	REDACTED	
4		
5		Transfer from a Hospital (Different Facility)
6		
7		Transfer from a Hospital (Different Facility)
8		
9		Non-Health Care Facility Point of Origin
10		
11		Non-Health Care Facility Point of Origin
12		
13		Non-Health Care Facility Point of Origin
14		
15		Non-Health Care Facility Point of Origin
16		
17		Non-Health Care Facility Point of Origin
18		
19		Non-Health Care Facility Point of Origin
20		
21		Non-Health Care Facility Point of Origin
22		
23		Non-Health Care Facility Point of Origin
24		
25		Non-Health Care Facility Point of Origin
26		
27		Non-Health Care Facility Point of Origin
28		
29		Non-Health Care Facility Point of Origin
30		
31		Non-Health Care Facility Point of Origin
32		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
3		
4		
5	SN/IC - D/T to SNF with Medicare Certification	E
6		
7	DIED - Expired	E
8		
9	HOME - Discharge to Home or Self Care (Routine Discharge)	
10		
11	HOME - Discharge to Home or Self Care (Routine Discharge)	
12		
13	HOME - Discharge to Home or Self Care (Routine Discharge)	
14		
15	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
16		
17	HOME - Discharge to Home or Self Care (Routine Discharge)	
18		
19	HOME - Discharge to Home or Self Care (Routine Discharge)	
20		
21	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
22		
23	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
24		
25	DIED - Expired	E
26		
27	SN/IC - D/T to SNF with Medicare Certification	E
28		
29	DIED - Expired	E
30		
31	DIED - Expired	E
32		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
33		REDACTED		V46.11	DEPENDENCE ON RESPIRATOR STATUS	137,885.40
34						
35				V46.11	DEPENDENCE ON RESPIRATOR STATUS	61,258.80
36						
37				V46.11	DEPENDENCE ON RESPIRATOR STATUS	123,361.05
38						
39				V46.11	DEPENDENCE ON RESPIRATOR STATUS	30,561.85
40						
41				V46.11	DEPENDENCE ON RESPIRATOR STATUS	36,985.10
42						
43				V46.11	DEPENDENCE ON RESPIRATOR STATUS	53,522.25
44						
45				V46.11	DEPENDENCE ON RESPIRATOR STATUS	359.00
46						
47				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,843.00
48						
49				V46.11	DEPENDENCE ON RESPIRATOR STATUS	296,653.30
50						
51				V46.11	DEPENDENCE ON RESPIRATOR STATUS	88,149.50
52						
53						
54				V46.11	DEPENDENCE ON RESPIRATOR STATUS	34,239.51
55						
56						
57				V46.11	DEPENDENCE ON RESPIRATOR STATUS	747,858.95
58						
59				V46.11	DEPENDENCE ON RESPIRATOR STATUS	232,740.40
60						
61				V46.11	DEPENDENCE ON RESPIRATOR STATUS	272,467.75

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
33	4	Inpatient	REDACTED		Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
34								
35	5	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
36								
37	8	Inpatient			KP Traditional	064	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W MCC	
38								
39	8	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
40								
41	3	Inpatient			Commercial	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
42								
43	7	Inpatient			Commercial	061	ACUTE ISCHEMIC STROKE W USE OF THROMBOLYTIC AGENT W MCC	
44								
45	25	Emergency			Medicare Advantage	UNK	Unknown DRG	
46								
47	18	Emergency			Medicare Advantage	UNK	Unknown DRG	
48								
49	16	Inpatient			HDHP	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	
50								
51	7	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
52								
53								
54	8	Hospital Ambulatory Surgery			KP Traditional	UNK	Unknown DRG	
55								
56								
57	20	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
58								
59	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
60								
61	3	Inpatient			TPL Non-Lien	064	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W MCC	

	O	P
1		
2	<b>PROV NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Non-Health Care Facility Point of Origin
33		
34		
		Non-Health Care Facility Point of Origin
35		
36		
		Transfer from a Hospital (Different Facility)
37		
38		
		Clinic or Physician's Office
39		
40		
		Non-Health Care Facility Point of Origin
41		
42		
		Non-Health Care Facility Point of Origin
43		
44		
45		
		Non-Health Care Facility Point of Origin
46		
47		
		Non-Health Care Facility Point of Origin
48		
		Non-Health Care Facility Point of Origin
49		
50		
		Non-Health Care Facility Point of Origin
51		
52		
53		
		Non-Health Care Facility Point of Origin
54		
55		
56		
		Clinic or Physician's Office
57		
58		
		Non-Health Care Facility Point of Origin
59		
60		
		Transfer from a Hospital (Different Facility)
61		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
33	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
34		
35	HOME HEALTH SERVICES - Discharge to Home Hospice	E
36		
37	SN/IC - D/T to SNF with Medicare Certification	E
38		
39	DIED - Expired	N
40		
41	OTHER CARE TO ANOTHER HOSP - D/T to Another Type	E
42		
43	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
44		
45	HOME - Discharge to Home or Self Care (Routine Discharge)	
46		
47	HOME - Discharge to Home or Self Care (Routine Discharge)	
48		
49	DIED - Expired	E
50		
51	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
52		
53		
54	HOME - Discharge to Home or Self Care (Routine Discharge)	
55		
56		
57	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
58		
59	DIED - Expired	E
60		
61	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE_DX_NAME</b>		<b>TOT_CHGS</b>
62		REDACTED				
63				V46.11	DEPENDENCE ON RESPIRATOR STATUS	285,637.40
64						
65				V46.11	DEPENDENCE ON RESPIRATOR STATUS	57,156.10
66						
67				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,190,451.25
68						
69				V46.11	DEPENDENCE ON RESPIRATOR STATUS	829,444.50
70						
71				V46.11	DEPENDENCE ON RESPIRATOR STATUS	6,304.40
72						
73				V46.11	DEPENDENCE ON RESPIRATOR STATUS	19,500.64
74						
75				V46.11	DEPENDENCE ON RESPIRATOR STATUS	234,884.90
76						
77				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,804.65
78						
79				V46.11	DEPENDENCE ON RESPIRATOR STATUS	27,961.65
80						
81				V46.11	DEPENDENCE ON RESPIRATOR STATUS	99,073.75
82						
83				V46.11	DEPENDENCE ON RESPIRATOR STATUS	25,861.25
84						
85				V46.11	DEPENDENCE ON RESPIRATOR STATUS	703,615.65
86				V46.11	DEPENDENCE ON RESPIRATOR STATUS	
87						
88				V46.11	DEPENDENCE ON RESPIRATOR STATUS	67,459.55
89						
90						
91				V46.11	DEPENDENCE ON RESPIRATOR STATUS	147,517.95

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
62			REDACTED					REDACTED
63	22	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
64								
65	2	Inpatient			KP Traditional	378	G.I. HEMORRHAGE W CC	
66								
67	16	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
68								
69	11	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
70								
71	10	Outpatient			KP Traditional	UNK	Unknown DRG	
72								
73	7	Hospital Ambulatory Surgery			Medicare Advantage	UNK	Unknown DRG	
74								
75	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
76								
77	5	Observation			KP Traditional	UNK	Unknown DRG	
78								
79	2	Inpatient			KP Traditional	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
80								
81	6	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
82								
83	3	Inpatient			KP Traditional	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
84								
85	21	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
86	21							
87								
88	8	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
89								
90								
91	2	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
62	REDACTED	
63		Transfer from a Hospital (Different Facility)
64		
65		Non-Health Care Facility Point of Origin
66		
67		Transfer from a Hospital (Different Facility)
68		
69		Transfer from a Hospital (Different Facility)
70		
71		Non-Health Care Facility Point of Origin
72		
73		Non-Health Care Facility Point of Origin
74		
75		Non-Health Care Facility Point of Origin
76		
77		Non-Health Care Facility Point of Origin
78		
79		Non-Health Care Facility Point of Origin
80		
81		Non-Health Care Facility Point of Origin
82		
83		Transfer from a Hospital (Different Facility)
84		
85		Transfer from a Hospital (Different Facility)
86		
87		
88		Non-Health Care Facility Point of Origin
89		
90		
91		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
62		
63	DIED - Expired	E
64		
65	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
66		
67	SN/IC - D/T to SNF with Medicare Certification	E
68		
69	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
70		
71	HOME - Discharge to Home or Self Care (Routine Discharge)	
72		
73	HOME - Discharge to Home or Self Care (Routine Discharge)	
74		
75	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
76		
77	HOME - Discharge to Home or Self Care (Routine Discharge)	
78		
79	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
80		
81	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
82		
83	SN/IC - D/T to SNF with Medicare Certification	E
84		
85	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
86	HOME - Discharge to Home or Self Care (Routine Discharge)	E
87		
88	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
89		
90		
91	HOME - Discharge to Home or Self Care (Routine Discharge)	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
92	REDACTED					
93	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	368,778.60
94	REDACTED					
95	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,932.00
96	REDACTED					
97	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	690,475.08
98	REDACTED					
99	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	60,620.35
100	REDACTED					
101	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	368,207.05
102	REDACTED					
103	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	467,973.91
104	REDACTED					
105	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	82,005.20
106	REDACTED					
107	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	8,339.35
108	REDACTED					
109	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	52,093.75
110	REDACTED					
111	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	34,119.10
112	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
113	REDACTED					
114	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	107,331.15
115	REDACTED					
116	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	256,217.85
117	REDACTED					
118	REDACTED					
119	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,005,002.00
120	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
121	REDACTED					
122	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,404,480.00

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
92			REDACTED					REDACTED
93	13	Inpatient			Medicare Advantage	377	G.I. HEMORRHAGE W MCC	
94								
95	11	Emergency			Medicare Advantage	UNK	Unknown DRG	
96								
97	34	Inpatient			KP Traditional	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	
98								
99	4	Inpatient			KP Medicaid	698	OTHER KIDNEY & URINARY TRACT DIAGNOSES W MCC	
100								
101	7	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
102								
103	15	Inpatient			KP Traditional	856	POSTOPERATIVE OR POST-TRAUMATIC INFECTIONS W O.R. PROC W MCC	
104								
105	5	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
106								
107	10	Outpatient			KP Traditional	UNK	Unknown DRG	
108								
109	3	Inpatient			Medicare Advantage	378	G.I. HEMORRHAGE W CC	
110								
111	7	Inpatient			Medicare Advantage	378	G.I. HEMORRHAGE W CC	
112	7							
113								
114	4	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
115								
116	12	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
117								
118								
119	3	Inpatient			Medicaid	988	NON-EXTENSIVE O.R. PROC UNRELATED TO PRINCIPAL DIAGNOSIS W CC	
120	3							
121								
122	3	Inpatient			Medicaid	092	OTHER DISORDERS OF NERVOUS SYSTEM W CC	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
92	REDACTED	
93		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
94		
95		Transfer from Another Health Care Facility
96		
97		Clinic or Physician's Office
98		
99		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
100		
101		Transfer from a Hospital (Different Facility)
102		
103		Clinic or Physician's Office
104		
105		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
106		
107		Non-Health Care Facility Point of Origin
108		
109		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
110		
111		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
112		
113		
114		Non-Health Care Facility Point of Origin
115		
116		Transfer from a Hospital (Different Facility)
117		
118		
119		Transfer from Another Health Care Facility
120		
121		
122		Transfer from a Hospital (Different Facility)

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
92		
93	SN/IC - D/T to SNF with Medicare Certification	E
94		
95	HOME - Discharge to Home or Self Care (Routine Discharge)	
96		
97	DIED - Expired	E
98		
99	SN/IC - D/T to SNF with Medicare Certification	E
100		
101	DIED - Expired	E
102		
103	DIED - Expired	E
104		
105	SN/IC - D/T to SNF with Medicare Certification	E
106		
107	HOME - Discharge to Home or Self Care (Routine Discharge)	
108		
109	SN/IC - D/T to SNF with Medicare Certification	E
110		
111	HOME - Discharge to Home or Self Care (Routine Discharge)	E
112	SN/IC - D/T to SNF with Medicare Certification	E
113		
114	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
115		
116	DIED - Expired	E
117		
118		
119	HOME - Discharge to Home or Self Care (Routine Discharge)	E
120	ACUTE CARE TO ANOTHER HOSP-D/T to a Medicare Certified Long Term Care Hosp (LTCH)	E
121		
122	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
123	REDACTED					
124	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	292,600.00
125	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
126	REDACTED					
127	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	219,450.00
128	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
129	REDACTED					
130	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	295,526.00
131	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
132	REDACTED					
133	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	228,228.00
134	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
135	REDACTED					
136	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	308,693.00
137	REDACTED					
138	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,463.00
139	REDACTED					
140	REDACTED					
141	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	95,958.00
142	REDACTED					
143	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	38,103.00
144	REDACTED					
145	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	295,200.20
146	REDACTED					
147	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	214,051.20
148	REDACTED					
149	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	339,817.75
150	REDACTED					

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING PROV ID
123			REDACTED					REDACTED
124	7	Inpatient			Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
125	7							
126								
127	9	Inpatient			Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
128	9							
129								
130	6	Inpatient			Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
131	6							
132								
133	5	Inpatient			Commercial	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
134	5							
135								
136	2	Inpatient			Medicaid	092	OTHER DISORDERS OF NERVOUS SYSTEM W CC	
137								
138	10	Inpatient			Medicaid	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
139								
140								
141	10	Inpatient			Medicare	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
142								
143	2	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
144								
145	9	Inpatient			KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
146								
147	10	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
148								
149	9	Inpatient			KP DHMO	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
150								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
123	REDACTED	
124		Transfer from a Hospital (Different Facility)
125		
126		
127		Transfer from a Hospital (Different Facility)
128		
129		
130		Transfer from a Hospital (Different Facility)
131		
132		
133		Transfer from a Hospital (Different Facility)
134		
135		
136		Transfer from a Hospital (Different Facility)
137		
138		Transfer from a Hospital (Different Facility)
139		
140		
141		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
142		
143		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
144		
145		Transfer from a Hospital (Different Facility)
146		
147		Clinic or Physician's Office
148		
149		Clinic or Physician's Office
150		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
123		
124	HOME - Discharge to Home or Self Care (Routine Discharge)	E
125	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
126		
127	DIED - Expired	E
128	HOME - Discharge to Home or Self Care (Routine Discharge)	E
129		
130	DIED - Expired	E
131	HOME - Discharge to Home or Self Care (Routine Discharge)	E
132		
133	DIED - Expired	E
134	HOME - Discharge to Home or Self Care (Routine Discharge)	E
135		
136	OTHER CARE W/I THIS HOSP - Admitted as an Inpt to this Hosp	E
137		
138	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
139		
140		
141	DIED - Expired	E
142		
143	SN/IC - D/T to SNF with Medicare Certification	E
144		
145	SN/IC - D/T to SNF with Medicare Certification	E
146		
147	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
148		
149	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
150		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
151		REDACTED		V46.11	DEPENDENCE ON RESPIRATOR STATUS	246,072.65
152						
153				V46.11	DEPENDENCE ON RESPIRATOR STATUS	27,683.15
154						
155						
156				V46.11	DEPENDENCE ON RESPIRATOR STATUS	403,778.25
157						
158				V46.11	DEPENDENCE ON RESPIRATOR STATUS	81,263.85
159						
160				V46.11	DEPENDENCE ON RESPIRATOR STATUS	78,298.63
161						
162				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,720.95
163						
164				V46.11	DEPENDENCE ON RESPIRATOR STATUS	35,142.25
165						
166				V46.11	DEPENDENCE ON RESPIRATOR STATUS	7,058.35
167						
168				V46.11	DEPENDENCE ON RESPIRATOR STATUS	54,174.15
169						
170				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,492,663.80
171						
172				V46.11	DEPENDENCE ON RESPIRATOR STATUS	33,352.80
173						
174				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,287,868.85
175						
176				V46.11	DEPENDENCE ON RESPIRATOR STATUS	204,422.75
177						
178				V46.11	DEPENDENCE ON RESPIRATOR STATUS	72,477.30
179						
180				V46.11	DEPENDENCE ON RESPIRATOR STATUS	59,893.85

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
151	16	Inpatient	REDACTED		Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	REDACTED
152								
153	3	Inpatient			Medicare Advantage	069	TRANSIENT ISCHEMIA	
154								
155								
156	9	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
157								
158	11	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
159								
160	3	Inpatient			KP Traditional	137	MOUTH PROCEDURES W CC/MCC	
161								
162	11	Emergency			Medicare Advantage	UNK	Unknown DRG	
163								
164	3	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
165								
166	5	Emergency			KP Traditional	UNK	Unknown DRG	
167								
168	2	Inpatient			Medicare Advantage	189	PULMONARY EDEMA & RESPIRATORY FAILURE	
169								
170	13	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
171								
172	2	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
173								
174	14	Inpatient			KP Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
175								
176	4	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
177								
178	5	Inpatient			Medicaid	193	SIMPLE PNEUMONIA & PLEURISY W MCC	
179								
180	3	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Transfer from a Hospital (Different Facility)
151		
152		
153		Transfer from One Distinct Unit to another Distinct Unit in Same Hospital
154		
155		
		Non-Health Care Facility Point of Origin
156		
157		
		Transfer from Another Health Care Facility
158		
159		
160		Non-Health Care Facility Point of Origin
161		
162		Non-Health Care Facility Point of Origin
163		
		Non-Health Care Facility Point of Origin
164		
165		
166		Non-Health Care Facility Point of Origin
167		
		Non-Health Care Facility Point of Origin
168		
169		
		Non-Health Care Facility Point of Origin
170		
171		
		Non-Health Care Facility Point of Origin
172		
173		
		Non-Health Care Facility Point of Origin
174		
175		
		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
176		
177		
178		Transfer from a Hospital (Different Facility)
179		
		Information Not Available
180		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
151	SN/IC - D/T to SNF with Medicare Certification	E
152		
153	SN/IC - D/T to SNF with Medicare Certification	E
154		
155		
156	HOME - Discharge to Home or Self Care (Routine Discharge)	E
157		
158	SN/IC - D/T to an Intermediate Care Facility (ICF)	E
159		
160	HOME - Discharge to Home or Self Care (Routine Discharge)	E
161		
162	HOME - Discharge to Home or Self Care (Routine Discharge)	
163		
164	HOME - Discharge to Home or Self Care (Routine Discharge)	E
165		
166	OTHER CARE TO ANOTHER HOSP - D/T to Another Type	
167		
168	SN/IC - D/T to SNF with Medicare Certification	E
169		
170	DIED - Expired	E
171		
172	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
173		
174	SN/IC - D/T to a Nursing Facility Certified under Medicaid but not Certified under Me	E
175		
176	SN/IC - D/T to an Intermediate Care Facility (ICF)	E
177		
178	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
179		
180	SN/IC - D/T to a Nursing Facility Certified under Medicaid but not Certified under Me	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
181	REDACTED					
182	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	156,065.15
183	REDACTED					
184	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	143,635.40
185	REDACTED					
186	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	21,643.30
187	REDACTED					
188	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	26,372.80
189	REDACTED					
190	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	573,692.05
191	REDACTED					
192	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	8,451.00
193	REDACTED					
194	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,625,777.75
195	REDACTED					
196	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	349,414.50
197	REDACTED					
198	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	69,619.75
199	REDACTED					
200	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	61,787.05
201	REDACTED					
202	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	251,188.55
203	REDACTED					
204	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	82,514.90
205	REDACTED					
206	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	75,996.25
207	REDACTED					
208	REDACTED					
209	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	652,678.70

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
181			REDACTED					REDACTED
182	5	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
183								
184	4	Inpatient			KP Traditional	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	
185								
186	3	Inpatient			Medicaid	100	SEIZURES W MCC	
187								
188	3	Inpatient			Medicaid	100	SEIZURES W MCC	
189								
190	14	Inpatient			KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
191								
192	2	Inpatient			Medicaid	206	OTHER RESPIRATORY SYSTEM DIAGNOSES W/O MCC	
193								
194	10	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
195								
196	5	Inpatient			TPL Non-Lien	963	OTHER MULTIPLE SIGNIFICANT TRAUMA W MCC	
197								
198	9	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
199								
200	7	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
201								
202	5	Inpatient			KP DHMO	864	FEVER	
203								
204	5	Inpatient			KP DHMO	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
205								
206	8	Inpatient			Medicare Advantage	091	OTHER DISORDERS OF NERVOUS SYSTEM W MCC	
207								
208								
209	13	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
181	REDACTED	
182		Transfer from a Hospital (Different Facility)
183		
184		Non-Health Care Facility Point of Origin
185		
186		Transfer from a Hospital (Different Facility)
187		
188		Transfer from a Hospital (Different Facility)
189		
190		Transfer from a Hospital (Different Facility)
191		
192		Non-Health Care Facility Point of Origin
193		
194		Transfer from a Hospital (Different Facility)
195		
196		Transfer from a Hospital (Different Facility)
197		
198		Transfer from a Hospital (Different Facility)
199		
200		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
201		
202		Transfer from a Hospital (Different Facility)
203		
204		Transfer from a Hospital (Different Facility)
205		
206		Transfer from a Hospital (Different Facility)
207		
208		
209		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
181		
182	SN/IC - D/T to SNF with Medicare Certification	E
183		
184	SN/IC - D/T to SNF with Medicare Certification	E
185		
186	HOME - Discharge to Home or Self Care (Routine Discharge)	E
187		
188	HOME - Discharge to Home or Self Care (Routine Discharge)	E
189		
190	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
191		
192	HOME - Discharge to Home or Self Care (Routine Discharge)	E
193		
194	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
195		
196	SN/IC - D/T to SNF with Medicare Certification	E
197		
198	DIED - Expired	E
199		
200	SN/IC - D/T to SNF with Medicare Certification	E
201		
202	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
203		
204	DIED - Expired	E
205		
206	DIED - Expired	E
207		
208		
209	SN/IC - D/T to SNF with Medicare Certification	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
210	REDACTED					
211	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	68,296.70
212	REDACTED					
213	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	11,014.60
214	REDACTED					
215	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	895,714.85
216	REDACTED					
217	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	67,381.45
218	REDACTED					
219	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	106,774.55
220	REDACTED					
221	REDACTED					
222	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,995.80
223	REDACTED					
224	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	527,608.95
225	REDACTED					
226	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	44,691.25
227	REDACTED					
228	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	63,863.40
229	REDACTED					
230	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	237,802.15
231	REDACTED					
232	REDACTED					
233	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	384,431.17
234	REDACTED					
235	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	137,666.25
236	REDACTED					
237	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	28,050.15

	G	H	I	J	K	L	M	N
1	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
210			REDACTED					REDACTED
211	5	Inpatient			Medicare Advantage	070	NONSPECIFIC CEREBROVASCULAR DISORDERS W MCC	
212								
213	2	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
214								
215	16	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
216								
217	4	Inpatient			Medicaid	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
218								
219	3	Inpatient			KP Traditional	091	OTHER DISORDERS OF NERVOUS SYSTEM W MCC	
220								
221								
222	21	Emergency			Medicare Advantage	UNK	Unknown DRG	
223								
224	7	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
225								
226	4	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
227								
228	4	Inpatient			Medicare Unassigned	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
229								
230	16	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
231								
232								
233	9	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
234								
235	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
236								
237	3	Inpatient			KP DHMO	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
210	REDACTED	
211		Non-Health Care Facility Point of Origin
212		
213		Transfer from a Hospital (Different Facility)
214		
215		Non-Health Care Facility Point of Origin
216		
217		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
218		
219		Transfer from a Hospital (Different Facility)
220		
221		
222		Non-Health Care Facility Point of Origin
223		
224		Transfer from a Hospital (Different Facility)
225		
226		Transfer from a Hospital (Different Facility)
227		
228		Transfer from a Hospital (Different Facility)
229		
230		Transfer from a Hospital (Different Facility)
231		
232		
233		Non-Health Care Facility Point of Origin
234		
235		Non-Health Care Facility Point of Origin
236		
237		Transfer from a Hospital (Different Facility)

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
210		
211	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
212		
213	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
214		
215	SN/IC - D/T to SNF with Medicare Certification	E
216		
217	DIED - Expired	E
218		
219	SN/IC - D/T to SNF with Medicare Certification	E
220		
221		
222	HOME - Discharge to Home or Self Care (Routine Discharge)	
223		
224	HOME HEALTH SERVICES - Discharge to Home Hospice	E
225		
226	HOME - Discharge to Home or Self Care (Routine Discharge)	E
227		
228	SN/IC - D/T to SNF with Medicare Certification	E
229		
230	DIED - Expired	E
231		
232		
233	DIED - Expired	E
234		
235	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
236		
237	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E

	A	B	C	D	E	F		
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED			
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>		
238	REDACTED							
239	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	122,383.23
240	REDACTED							
241	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	78,590.05
242	REDACTED							
243	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,086,866.40
244	REDACTED							
245	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,266,839.70
246	REDACTED							
247	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	114,533.05
248	REDACTED							
249	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,451,308.70
250	REDACTED							
251	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	164,542.15
252	REDACTED							
253	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	172,039.93
254	REDACTED							
255	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	141,822.10
256	REDACTED							
257	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	190,605.45
258	REDACTED							
259	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,298.85
260	REDACTED							
261	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,323.60
262	REDACTED							
263	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	452,948.50
264	REDACTED							
265	REDACTED					V46.11	DEPENDENCE ON RESPIRATOR STATUS	89,233.55
266	REDACTED							

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
238			REDACTED					REDACTED
239	3	Inpatient			Medicare Advantage	668	TRANSURETHRAL PROCEDURES W MCC	
240								
241	2	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
242								
243	13	Newborn			Medicaid	789	NEONATES, DIED OR TRANSFERRED TO ANOTHER ACUTE CARE FACILITY	
244								
245	5	Inpatient			Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
246								
247	3	Inpatient			Medicare Unassigned	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
248								
249	18	Newborn			KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
250								
251	10	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
252								
253	3	Inpatient			Medicare Advantage	163	MAJOR CHEST PROCEDURES W MCC	
254								
255	9	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
256								
257	10	Inpatient			Medicare Advantage	064	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W MCC	
258								
259	16	Emergency			Medicare Advantage	UNK	Unknown DRG	
260								
261	14	Emergency			Medicare Advantage	UNK	Unknown DRG	
262								
263	5	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
264								
265	13	Inpatient			Medicaid	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
266								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
238	REDACTED	
239		Non-Health Care Facility Point of Origin
240		
241		Non-Health Care Facility Point of Origin
242		
243		Born Inside this Hospital
244		
245		Transfer from a Hospital (Different Facility)
246		
247		Non-Health Care Facility Point of Origin
248		
249		Born Inside this Hospital
250		
251		Non-Health Care Facility Point of Origin
252		
253		Non-Health Care Facility Point of Origin
254		
255		Transfer from a Hospital (Different Facility)
256		
257		Non-Health Care Facility Point of Origin
258		
259		Clinic or Physician's Office
260		
261		Non-Health Care Facility Point of Origin
262		
263		Non-Health Care Facility Point of Origin
264		
265		Non-Health Care Facility Point of Origin
266		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
238		
239	HOME - Discharge to Home or Self Care (Routine Discharge)	E
240		
241	HOME - Discharge to Home or Self Care (Routine Discharge)	E
242		
243	DIED - Expired	E
244		
245	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
246		
247	SN/IC - D/T to SNF with Medicare Certification	E
248		
249	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
250		
251	DIED - Expired	E
252		
253	HOME - Discharge to Home or Self Care (Routine Discharge)	E
254		
255	DIED - Expired	E
256		
257	DIED - Expired	Y
258		
259	HOME - Discharge to Home or Self Care (Routine Discharge)	
260		
261	HOME - Discharge to Home or Self Care (Routine Discharge)	
262		
263	HOME - Discharge to Home or Self Care (Routine Discharge)	E
264		
265	Acute Care to Another Hosp-D/T to Critical Access Hosp (Rural Hosp)	E
266		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
267	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	45,918.10
268	REDACTED					
269	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	18,007.80
270	REDACTED					
271	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	59,117.35
272	REDACTED					
273	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	14,202.10
274	REDACTED					
275	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	99,083.35
276	REDACTED					
277	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,308.90
278	REDACTED					
279	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,391.70
280	REDACTED					
281	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	8,410.00
282	REDACTED					
283	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,921.00
284	REDACTED					
285	REDACTED					
286	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	183,786.72
287	REDACTED					
288	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,891,992.77
289	REDACTED					
290	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	505,810.11
291	REDACTED					
292	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	269,760.10
293	REDACTED					
294	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	155,435.20
295	REDACTED					

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
267	4	Inpatient	REDACTED		KP DHMO	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
268								
269	2	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
270								
271	12	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
272								
273	5	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
274								
275	6	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
276								
277	2	Outpatient			Medicaid	UNK	Unknown DRG	
278								
279	11	Emergency			Medicaid	UNK	Unknown DRG	
280								
281	13	Emergency			KP Traditional	UNK	Unknown DRG	
282								
283	15	Emergency			Medicare Advantage	UNK	Unknown DRG	
284								
285								
286	10	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
287								
288	3	Inpatient			Medicare Advantage	673	OTHER KIDNEY & URINARY TRACT PROCEDURES W MCC	
289								
290	11	Inpatient			KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
291								
292	13	Inpatient			KP Medicaid	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
293								
294	5	Inpatient			Medicare Advantage	963	OTHER MULTIPLE SIGNIFICANT TRAUMA W MCC	
295								

	O	P
1		
2	<b>PROV NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Non-Health Care Facility Point of Origin
267		
268		
		Clinic or Physician's Office
269		
270		
		Transfer from a Hospital (Different Facility)
271		
272		
		Transfer from a Hospital (Different Facility)
273		
274		
		Transfer from a Hospital (Different Facility)
275		
276		
277		Non-Health Care Facility Point of Origin
278		
279		Non-Health Care Facility Point of Origin
280		
281		Non-Health Care Facility Point of Origin
282		
283		Non-Health Care Facility Point of Origin
284		
285		
		Transfer from a Hospital (Different Facility)
286		
287		
		Non-Health Care Facility Point of Origin
288		
289		
		Clinic or Physician's Office
290		
291		
		Non-Health Care Facility Point of Origin
292		
293		
		Transfer from Another Health Care Facility
294		
295		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
267	DIED - Expired	E
268		
269	HOME - Discharge to Home or Self Care (Routine Discharge)	E
270		
271	SN/IC - D/T to SNF with Medicare Certification	E
272		
273	DIED - Expired	E
274		
275	DIED - Expired	E
276		
277	HOME - Discharge to Home or Self Care (Routine Discharge)	
278		
279	HOME - Discharge to Home or Self Care (Routine Discharge)	
280		
281	OTHER CARE AT ANOTHER HOSP - D/T to a psych hosp or psych distinct part unit of a hos	
282		
283	HOME - Discharge to Home or Self Care (Routine Discharge)	
284		
285		
286	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
287		
288	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
289		
290	SN/IC - D/T to SNF with Medicare Certification	E
291		
292	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
293		
294	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
295		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	405,763.06
296	REDACTED					
297	REDACTED					
298	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	128,442.15
299	REDACTED					
300	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,416.00
301	REDACTED					
302	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,784.00
303	REDACTED					
304	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,165.25
305	REDACTED					
306	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,600.45
307	REDACTED					
308	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,445.50
309	REDACTED					
310	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	16,246.90
311	REDACTED					
312	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	204,147.36
313	REDACTED					
314	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	593,714.60
315	REDACTED					
316	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	109,515.65
317	REDACTED					
318	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	760,488.05
319	REDACTED					
320	REDACTED					
321	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	17,989.45
322	REDACTED					
323	REDACTED					
324	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,287,286.66
325	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	
326	REDACTED					
327	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	277,920.15
328	REDACTED					

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
296	10	Inpatient	REDACTED		Medicaid	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	REDACTED
297								
298	4	Inpatient			Medicare Advantage	052	SPINAL DISORDERS & INJURIES W CC/MCC	
299								
300	22	Emergency			Medicare Advantage	UNK	Unknown DRG	
301								
302	7	Emergency			KP DHMO	UNK	Unknown DRG	
303								
304	6	Emergency			Medicare Advantage	UNK	Unknown DRG	
305								
306	7	Emergency			Medicare Advantage	UNK	Unknown DRG	
307								
308	21	Emergency			Medicare Advantage	UNK	Unknown DRG	
309								
310	16	Hospital Ambulatory Surgery			KP Traditional	UNK	Unknown DRG	
311								
312	9	Inpatient			KP DHMO	459	SPINAL FUSION EXCEPT CERVICAL W MCC	
313								
314	11	Inpatient			KP Traditional	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	
315								
316	16	Inpatient			Medicare Advantage	974	HIV W MAJOR RELATED CONDITION W MCC	
317								
318	25	Inpatient			Medicaid	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
319								
320								
321	5	Inpatient			KP Medicaid	166	OTHER RESP SYSTEM O.R. PROCEDURES W MCC	
322								
323								
324	23	Inpatient			Medicare Cost	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
325	23							
326								
327	5	Inpatient			Self Funding	963	OTHER MULTIPLE SIGNIFICANT TRAUMA W MCC	
328								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Transfer from a Hospital (Different Facility)
296		
297		
298		Transfer from a Hospital (Different Facility)
299		
300		Transfer from Another Health Care Facility
301		
302		Non-Health Care Facility Point of Origin
303		
304		Non-Health Care Facility Point of Origin
305		
306		Non-Health Care Facility Point of Origin
307		
308		Non-Health Care Facility Point of Origin
309		
310		Non-Health Care Facility Point of Origin
311		
312		Transfer from Another Health Care Facility
313		
		Transfer from a Hospital (Different Facility)
314		
315		
316		Non-Health Care Facility Point of Origin
317		
		Non-Health Care Facility Point of Origin
318		
319		
320		
		Transfer from Another Health Care Facility
321		
322		
323		
		Non-Health Care Facility Point of Origin
324		
325		
326		
		Transfer from a Hospital (Different Facility)
327		
328		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
296	SN/IC - D/T to SNF with Medicare Certification	E
297		
298	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
299		
300	HOME - Discharge to Home or Self Care (Routine Discharge)	
301		
302	HOME - Discharge to Home or Self Care (Routine Discharge)	
303		
304	HOME - Discharge to Home or Self Care (Routine Discharge)	
305		
306	HOME - Discharge to Home or Self Care (Routine Discharge)	
307		
308	HOME - Discharge to Home or Self Care (Routine Discharge)	
309		
310	HOME - Discharge to Home or Self Care (Routine Discharge)	
311		
312	OTHER CARE TO ANOTHER HOSP - D/T to Another Type	E
313		
314	SN/IC - D/T to SNF with Medicare Certification	E
315		
316	DIED - Expired	E
317		
318	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
319		
320		
321	HOME - Discharge to Home or Self Care (Routine Discharge)	E
322		
323		
324	ACUTE CARE W/I THIS HOSP - Admitted as an Inpt to this Hosp	E
325	DIED - Expired	E
326		
327	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
328		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
		REDACTED		V46.11	DEPENDENCE ON RESPIRATOR STATUS	226,483.36
329						
330				V46.11	DEPENDENCE ON RESPIRATOR STATUS	27,107.26
331						
332				V46.11	DEPENDENCE ON RESPIRATOR STATUS	144,522.05
333						
334				V46.11	DEPENDENCE ON RESPIRATOR STATUS	243,325.51
335						
336				V46.11	DEPENDENCE ON RESPIRATOR STATUS	128,814.00
337						
338				V46.11	DEPENDENCE ON RESPIRATOR STATUS	
339						
340				V46.11	DEPENDENCE ON RESPIRATOR STATUS	208,120.02
341						
342				V46.11	DEPENDENCE ON RESPIRATOR STATUS	363,724.31
343						
344				V46.11	DEPENDENCE ON RESPIRATOR STATUS	64,833.73
345						
346				V46.11	DEPENDENCE ON RESPIRATOR STATUS	386,907.65
347						
348				V46.11	DEPENDENCE ON RESPIRATOR STATUS	213,608.95
349						
350				V46.11	DEPENDENCE ON RESPIRATOR STATUS	70,397.10
351						
352				V46.11	DEPENDENCE ON RESPIRATOR STATUS	11,274.90
353						
354				V46.11	DEPENDENCE ON RESPIRATOR STATUS	87,260.30
355						

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
329	7	Inpatient	REDACTED		Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	REDACTED
330								
331	3	Inpatient			KP Traditional	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
332								
333	12	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
334								
335	11	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
336								
337	5	Inpatient			Medicare Advantage	698	OTHER KIDNEY & URINARY TRACT DIAGNOSES W MCC	
338	5							
339								
340	8	Inpatient			Medicare	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
341								
342	18	Inpatient			KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
343								
344	6	Inpatient			Medicare Advantage	064	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W MCC	
345								
346								
347	9	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
348								
349	5	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
350								
351	7	Inpatient			Medicare Advantage	417	LAPAROSCOPIC CHOLECYSTECTOMY W/O C.D.E. W MCC	
352								
353	4	Inpatient			KP Medicaid	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
354								
355	6	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Transfer from a Hospital (Different Facility)
329		
330		
		Non-Health Care Facility Point of Origin
331		
332		
		Transfer from a Hospital (Different Facility)
333		
334		
		Non-Health Care Facility Point of Origin
335		
336		
		Transfer from a Hospital (Different Facility)
337		
338		
339		
		Non-Health Care Facility Point of Origin
340		
341		
		Non-Health Care Facility Point of Origin
342		
343		
		Non-Health Care Facility Point of Origin
344		
345		
346		
		Non-Health Care Facility Point of Origin
347		
348		
		Transfer from a Hospital (Different Facility)
349		
350		
		Non-Health Care Facility Point of Origin
351		
352		
		Non-Health Care Facility Point of Origin
353		
354		
		Non-Health Care Facility Point of Origin
355		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
329	SN/IC - D/T to SNF with Medicare Certification	E
330		
331	RESIDENTIAL CARE - Discharge to Home or Self Care (Routine Discharge)	E
332		
333	HOME - Discharge to Home or Self Care (Routine Discharge)	E
334		
335	SN/IC - D/T to SNF with Medicare Certification	E
336		
337	SN/IC - D/T to SNF with Medicare Certification	E
338	HOME - Discharge to Home or Self Care (Routine Discharge)	E
339		
340	DIED - Expired	E
341		
342	DIED - Expired	E
343		
344	DIED - Expired	E
345		
346		
347	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
348		
349	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
350		
351	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
352		
353	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
354		
355	DIED - Expired	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
356		REDACTED				
357				V46.11	DEPENDENCE ON RESPIRATOR STATUS	75,942.95
358						
359				V46.11	DEPENDENCE ON RESPIRATOR STATUS	51,009.15
360						
361						
362				V46.11	DEPENDENCE ON RESPIRATOR STATUS	663.20
363						
364				V46.11	DEPENDENCE ON RESPIRATOR STATUS	675.15
365						
366				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,506.60
367						
368				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,296.00
369						
370				V46.11	DEPENDENCE ON RESPIRATOR STATUS	600.45
371						
372				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,161.55
373						
374				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,855.40
375						
376				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,394.45
377						
378				V46.11	DEPENDENCE ON RESPIRATOR STATUS	667.00
379						
380				V46.11	DEPENDENCE ON RESPIRATOR STATUS	667.70
381						
382				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,245.85
383						
384				V46.11	DEPENDENCE ON RESPIRATOR STATUS	605.50
385						
386				V46.11	DEPENDENCE ON RESPIRATOR STATUS	600.45
387						
388				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,933.45
389						
390				V46.11	DEPENDENCE ON RESPIRATOR STATUS	600.45
391						
392				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,196.00
393						

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
356			REDACTED					REDACTED
357	7	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
358								
359	9	Inpatient			KP Medicaid	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
360								
361								
362	6	Outpatient			KP Traditional	UNK	Unknown DRG	
363								
364	7	Outpatient			KP Traditional	UNK	Unknown DRG	
365								
366	7	Outpatient			KP Traditional	UNK	Unknown DRG	
367								
368	7	Outpatient			KP Traditional	UNK	Unknown DRG	
369								
370	8	Outpatient			KP Traditional	UNK	Unknown DRG	
371								
372	9	Outpatient			KP Traditional	UNK	Unknown DRG	
373								
374	14	Outpatient			KP Traditional	UNK	Unknown DRG	
375								
376	5	Outpatient			KP Traditional	UNK	Unknown DRG	
377								
378	11	Outpatient			KP Traditional	UNK	Unknown DRG	
379								
380	3	Outpatient			KP Traditional	UNK	Unknown DRG	
381								
382	11	Outpatient			KP Traditional	UNK	Unknown DRG	
383								
384	12	Outpatient			KP Traditional	UNK	Unknown DRG	
385								
386	3	Outpatient			KP Traditional	UNK	Unknown DRG	
387								
388	13	Outpatient			KP Traditional	UNK	Unknown DRG	
389								
390	8	Outpatient			KP Traditional	UNK	Unknown DRG	
391								
392	14	Outpatient			KP Traditional	UNK	Unknown DRG	
393								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
356	REDACTED	
357		Non-Health Care Facility Point of Origin
358		
359		Non-Health Care Facility Point of Origin
360		
361		
362		Non-Health Care Facility Point of Origin
363		
364		Non-Health Care Facility Point of Origin
365		
366		Non-Health Care Facility Point of Origin
367		
368		Non-Health Care Facility Point of Origin
369		
370		Non-Health Care Facility Point of Origin
371		
372		Non-Health Care Facility Point of Origin
373		
374		Non-Health Care Facility Point of Origin
375		
376		Non-Health Care Facility Point of Origin
377		
378		Non-Health Care Facility Point of Origin
379		
380		Non-Health Care Facility Point of Origin
381		
382		Non-Health Care Facility Point of Origin
383		
384		Non-Health Care Facility Point of Origin
385		
386		Non-Health Care Facility Point of Origin
387		
388		Non-Health Care Facility Point of Origin
389		
390		Non-Health Care Facility Point of Origin
391		
392		Non-Health Care Facility Point of Origin
393		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
356		
357	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
358		
359	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
360		
361		
362	HOME - Discharge to Home or Self Care (Routine Discharge)	
363		
364	HOME - Discharge to Home or Self Care (Routine Discharge)	
365		
366	HOME - Discharge to Home or Self Care (Routine Discharge)	
367		
368	HOME - Discharge to Home or Self Care (Routine Discharge)	
369		
370	HOME - Discharge to Home or Self Care (Routine Discharge)	
371		
372	HOME - Discharge to Home or Self Care (Routine Discharge)	
373		
374	HOME - Discharge to Home or Self Care (Routine Discharge)	
375		
376	HOME - Discharge to Home or Self Care (Routine Discharge)	
377		
378	HOME - Discharge to Home or Self Care (Routine Discharge)	
379		
380	HOME - Discharge to Home or Self Care (Routine Discharge)	
381		
382	HOME - Discharge to Home or Self Care (Routine Discharge)	
383		
384	HOME - Discharge to Home or Self Care (Routine Discharge)	
385		
386	HOME - Discharge to Home or Self Care (Routine Discharge)	
387		
388	HOME - Discharge to Home or Self Care (Routine Discharge)	
389		
390	HOME - Discharge to Home or Self Care (Routine Discharge)	
391		
392	HOME - Discharge to Home or Self Care (Routine Discharge)	
393		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
394	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,308.45
395	REDACTED					
396	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,166.45
397	REDACTED					
398	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	958.45
399	REDACTED					
400	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,422.05
401	REDACTED					
402	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,060,434.29
403	REDACTED					
404	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	586,482.00
405	REDACTED					
406	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	529,168.65
407	REDACTED					
408	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	418,771.83
409	REDACTED					
410	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	18,361.55
411	REDACTED					
412	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	25,440.50
413	REDACTED					
414	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	48,928.95
415	REDACTED					
416	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	36,248.95
417	REDACTED					
418	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	34,290.85
419	REDACTED					
420	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	68,836.65
421	REDACTED					
422	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	86,578.50
423	REDACTED					

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
394	17	Outpatient	REDACTED	REDACTED	KP Traditional	UNK	Unknown DRG	REDACTED
395								
396	8	Outpatient	REDACTED	REDACTED	KP Traditional	UNK	Unknown DRG	REDACTED
397								
398	5	Outpatient	REDACTED	REDACTED	KP Traditional	UNK	Unknown DRG	REDACTED
399								
400	12	Emergency	REDACTED	REDACTED	Self Funding	UNK	Unknown DRG	REDACTED
401								
402	16	Inpatient	REDACTED	REDACTED	KP Traditional	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	REDACTED
403								
404	13	Inpatient	REDACTED	REDACTED	Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	REDACTED
405								
406	13	Inpatient	REDACTED	REDACTED	KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	REDACTED
407								
408	10	Inpatient	REDACTED	REDACTED	Medicare	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	REDACTED
409								
410	7	Inpatient	REDACTED	REDACTED	KP Traditional	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	REDACTED
411								
412	5	Inpatient	REDACTED	REDACTED	Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	REDACTED
413								
414	7	Inpatient	REDACTED	REDACTED	Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	REDACTED
415								
416	3	Inpatient	REDACTED	REDACTED	Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	REDACTED
417								
418	5	Inpatient	REDACTED	REDACTED	Medicare Advantage	394	OTHER DIGESTIVE SYSTEM DIAGNOSES W CC	REDACTED
419								
420	15	Inpatient	REDACTED	REDACTED	Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	REDACTED
421								
422	9	Inpatient	REDACTED	REDACTED	Medicare Advantage	389	G.I. OBSTRUCTION W CC	REDACTED
423								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
394	REDACTED	Non-Health Care Facility Point of Origin
395		
396		Non-Health Care Facility Point of Origin
397		
398		Non-Health Care Facility Point of Origin
399		
400		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
401		
		Non-Health Care Facility Point of Origin
402		
403		
		Non-Health Care Facility Point of Origin
404		
405		
		Non-Health Care Facility Point of Origin
406		
407		
		Transfer from a Hospital (Different Facility)
408		
409		
		Non-Health Care Facility Point of Origin
410		
411		
		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
412		
413		
		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
414		
415		
		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
416		
417		
418		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
419		
		Non-Health Care Facility Point of Origin
420		
421		
422		Non-Health Care Facility Point of Origin
423		

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
394	HOME - Discharge to Home or Self Care (Routine Discharge)	
395		
396	HOME - Discharge to Home or Self Care (Routine Discharge)	
397		
398	HOME - Discharge to Home or Self Care (Routine Discharge)	
399		
400	SN/IC - D/T to a Nursing Facility Certified under Medicaid but not Certified under Me	
401		
402	SN/IC - D/T to SNF with Medicare Certification	E
403		
404	DIED - Expired	E
405		
406	DIED - Expired	E
407		
408	SN/IC - D/T to SNF with Medicare Certification	E
409		
410	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
411		
412	SN/IC - D/T to SNF with Medicare Certification	E
413		
414	SN/IC - D/T to SNF with Medicare Certification	E
415		
416	SN/IC - D/T to SNF with Medicare Certification	E
417		
418	SN/IC - D/T to SNF with Medicare Certification	E
419		
420	SN/IC - D/T to SNF with Medicare Certification	E
421		
422	SN/IC - D/T to SNF with Medicare Certification	E
423		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
424	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	9,684.45
425	REDACTED					
426	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,984,766.29
427	REDACTED					
428	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,268,755.15
429	REDACTED					
430	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	50,287.30
431	REDACTED					
432	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	52,549.20
433	REDACTED					
434	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	50,465.30
435	REDACTED					
436	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	47,042.45
437	REDACTED					
438	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,190,442.90
439	REDACTED					
440	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	146,234.85
441	REDACTED					
442	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	424,158.25
443	REDACTED					
444	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	107,565.75
445	REDACTED					
446	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	242,638.60
447	REDACTED					
448	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	181,449.20
449	REDACTED					
450	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	81,935.50
451	REDACTED					
452	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	6,307.20

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
	3	Inpatient	REDACTED	REDACTED	KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	REDACTED
424								
425								
	31	Inpatient	REDACTED	REDACTED	KP Traditional	326	STOMACH, ESOPHAGEAL & DUODENAL PROC W MCC	REDACTED
426								
427								
	21	Inpatient	REDACTED	REDACTED	Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	REDACTED
428								
429								
430	3	Inpatient	REDACTED	REDACTED	Medicare Advantage	388	G.I. OBSTRUCTION W MCC	REDACTED
431								
	4	Inpatient	REDACTED	REDACTED	Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	REDACTED
432								
433								
	2	Inpatient	REDACTED	REDACTED	Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	REDACTED
434								
435								
	8	Inpatient	REDACTED	REDACTED	Medicare Advantage	698	OTHER KIDNEY & URINARY TRACT DIAGNOSES W MCC	REDACTED
436								
437								
	17	Inpatient	REDACTED	REDACTED	Medicare Advantage	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	REDACTED
438								
439								
	4	Inpatient	REDACTED	REDACTED	Medicare Advantage	291	HEART FAILURE & SHOCK W MCC	REDACTED
440								
441								
	13	Inpatient	REDACTED	REDACTED	Medicare Advantage	231	CORONARY BYPASS W PTCA W MCC	REDACTED
442								
443								
	3	Inpatient	REDACTED	REDACTED	Commercial	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
444								
445								
	4	Inpatient	REDACTED	REDACTED	Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
446								
447								
	6	Inpatient	REDACTED	REDACTED	Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
448								
449								
	4	Inpatient	REDACTED	REDACTED	KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	REDACTED
450								
451								
452	3	Observation	REDACTED	REDACTED	KP Traditional	UNK	Unknown DRG	REDACTED

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
	REDACTED	Non-Health Care Facility Point of Origin
424		
425		Non-Health Care Facility Point of Origin
426		
427		Non-Health Care Facility Point of Origin
428		
429		Non-Health Care Facility Point of Origin
430		
431		Non-Health Care Facility Point of Origin
432		
433		Non-Health Care Facility Point of Origin
434		
435		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
436		
437		Transfer from a Hospital (Different Facility)
438		
439		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
440		
441		Transfer from a Hospital (Different Facility)
442		
443		Non-Health Care Facility Point of Origin
444		
445		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
446		
447		Non-Health Care Facility Point of Origin
448		
449		Non-Health Care Facility Point of Origin
450		
451		
452		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
424	HOME - Discharge to Home or Self Care (Routine Discharge)	E
425		
426	DIED - Expired	N
427		
428	SN/IC - D/T to SNF with Medicare Certification	E
429		
430	DIED - Expired	E
431		
432	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
433		
434	SN/IC - D/T to SNF with Medicare Certification	E
435		
436	SN/IC - D/T to SNF with Medicare Certification	E
437		
438	SN/IC - D/T to SNF with Medicare Certification	E
439		
440	SN/IC - D/T to SNF with Medicare Certification	E
441		
442	SN/IC - D/T to SNF with Medicare Certification	E
443		
444	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
445		
446	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
447		
448	SN/IC - D/T to SNF with Medicare Certification	E
449		
450	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
451		
452	HOME - Discharge to Home or Self Care (Routine Discharge)	

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
453	REDACTED					
454	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	12,812.25
455	REDACTED					
456	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	663,047.00
457	REDACTED					
458	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	603.80
459	REDACTED					
460	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,474.80
461	REDACTED					
462	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	663.65
463	REDACTED					
464	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	600.45
465	REDACTED					
466	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	99,232.80
467	REDACTED					
468	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	6,770.45
469	REDACTED					
470	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	9,164.45
471	REDACTED					
472	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	7,290.45
473	REDACTED					
474	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	7,229.85
475	REDACTED					
476	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	7,290.45
477	REDACTED					
478	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	61,057.35
479	REDACTED					
480	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	515,021.70
481	REDACTED					
482	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	11,047.25

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
453			REDACTED					REDACTED
454	2	Inpatient			KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	
455								
456	6	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
457								
458	13	Outpatient			KP Traditional	UNK	Unknown DRG	
459								
460	16	Outpatient			KP Traditional	UNK	Unknown DRG	
461								
462	16	Outpatient			KP Traditional	UNK	Unknown DRG	
463								
464	3	Outpatient			KP Traditional	UNK	Unknown DRG	
465								
466	6	Inpatient			Medicaid	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
467								
468	2	Inpatient			KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	
469								
470	2	Inpatient			KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	
471								
472	2	Inpatient			KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	
473								
474	16	Observation			Medicare Advantage	UNK	Unknown DRG	
475								
476	2	Inpatient			KP Traditional	642	INBORN AND OTHER DISORDERS OF METABOLISM	
477								
478	11	Inpatient			KP Traditional	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
479								
480	6	Inpatient			Medicare Advantage	056	DEGENERATIVE NERVOUS SYSTEM DISORDERS W MCC	
481								
482	2	Inpatient			KP Traditional	092	OTHER DISORDERS OF NERVOUS SYSTEM W CC	

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2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
453	REDACTED	
454		Non-Health Care Facility Point of Origin
455		
456		Transfer from a Hospital (Different Facility)
457		
458		Non-Health Care Facility Point of Origin
459		
460		Non-Health Care Facility Point of Origin
461		
462		Non-Health Care Facility Point of Origin
463		
464		Non-Health Care Facility Point of Origin
465		
466		Non-Health Care Facility Point of Origin
467		
468		Non-Health Care Facility Point of Origin
469		
470		Non-Health Care Facility Point of Origin
471		
472		Non-Health Care Facility Point of Origin
473		
474		Non-Health Care Facility Point of Origin
475		
476		Non-Health Care Facility Point of Origin
477		
478		Non-Health Care Facility Point of Origin
479		
480		Transfer from a Hospital (Different Facility)
481		
482		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
453		
454	HOME - Discharge to Home or Self Care (Routine Discharge)	E
455		
456	SN/IC - D/T to SNF with Medicare Certification	E
457		
458	HOME - Discharge to Home or Self Care (Routine Discharge)	
459		
460	HOME - Discharge to Home or Self Care (Routine Discharge)	
461		
462	HOME - Discharge to Home or Self Care (Routine Discharge)	
463		
464	HOME - Discharge to Home or Self Care (Routine Discharge)	
465		
466	ACUTE CARE TO ANOTHER HOSP-D/T to a Medicare Certified Long Term Care Hosp (LTCH)	E
467		
468	HOME - Discharge to Home or Self Care (Routine Discharge)	E
469		
470	HOME - Discharge to Home or Self Care (Routine Discharge)	E
471		
472	HOME - Discharge to Home or Self Care (Routine Discharge)	E
473		
474	HOME - Discharge to Home or Self Care (Routine Discharge)	
475		
476	HOME - Discharge to Home or Self Care (Routine Discharge)	E
477		
478	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
479		
480	SN/IC - D/T to SNF with Medicare Certification	E
481		
482	HOME - Discharge to Home or Self Care (Routine Discharge)	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
483		REDACTED				
484				V46.11	DEPENDENCE ON RESPIRATOR STATUS	75,800.95
485						
486				V46.11	DEPENDENCE ON RESPIRATOR STATUS	79,580.45
487						
488				V46.11	DEPENDENCE ON RESPIRATOR STATUS	21,438.60
489						
490				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,307.00
491						
492						
493				V46.11	DEPENDENCE ON RESPIRATOR STATUS	574,501.05
494						
495				V46.11	DEPENDENCE ON RESPIRATOR STATUS	48,073.50
496						
497				V46.11	DEPENDENCE ON RESPIRATOR STATUS	54,961.95
498						
499				V46.11	DEPENDENCE ON RESPIRATOR STATUS	190,824.00
500						
501				V46.11	DEPENDENCE ON RESPIRATOR STATUS	548,269.25
502						
503				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,337.10
504						
505				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,062.50
506						
507				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,635.95
508						
509				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,748.90
510						
511				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,015.35
512						
513				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,496.40
514						
515				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,528.75
516						

	G	H	I	J	K	L	M	N
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2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
483			REDACTED					REDACTED
484	4	Inpatient			KP Traditional	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
485								
486								
487	4	Inpatient			Medicare Advantage	064	INTRACRANIAL HEMORRHAGE OR CEREBRAL INFARCTION W MCC	
488								
489	2	Inpatient			KP Medicaid	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
490								
491	12	Emergency			Medicare Advantage	UNK	Unknown DRG	
492								
493								
494	12	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
495								
496	3	Inpatient			Medicare Advantage	389	G.I. OBSTRUCTION W CC	
497								
498	3	Inpatient			Medicare Unassigned	915	ALLERGIC REACTIONS W MCC	
499								
500	17	Inpatient			Medicare Advantage	907	OTHER O.R. PROCEDURES FOR INJURIES W MCC	
501								
502	11	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
503								
504	16	Emergency			Medicare Advantage	UNK	Unknown DRG	
505								
506	14	Emergency			Medicare Advantage	UNK	Unknown DRG	
507								
508	19	Emergency			Medicare Advantage	UNK	Unknown DRG	
509								
510	23	Emergency			Medicare Advantage	UNK	Unknown DRG	
511								
512	29	Emergency			Medicare Advantage	UNK	Unknown DRG	
513								
514	35	Emergency			Medicare Advantage	UNK	Unknown DRG	
515								
516	17	Emergency			Medicare Advantage	UNK	Unknown DRG	

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1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
483	REDACTED	
484		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
485		
486		
487		Transfer from a Hospital (Different Facility)
488		
489		Transfer from a Hospital (Different Facility)
490		
491		Non-Health Care Facility Point of Origin
492		
493		
494		Non-Health Care Facility Point of Origin
495		
496		Non-Health Care Facility Point of Origin
497		
498		Non-Health Care Facility Point of Origin
499		
500		Non-Health Care Facility Point of Origin
501		
502		Non-Health Care Facility Point of Origin
503		
504		Non-Health Care Facility Point of Origin
505		
506		Non-Health Care Facility Point of Origin
507		
508		Non-Health Care Facility Point of Origin
509		
510		Non-Health Care Facility Point of Origin
511		
512		Non-Health Care Facility Point of Origin
513		
514		Non-Health Care Facility Point of Origin
515		
516		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
483		
484	SN/IC - D/T to SNF with Medicare Certification	E
485		
486		
487	DIED - Expired	E
488		
489	HOME - Discharge to Home or Self Care (Routine Discharge)	E
490		
491	HOME - Discharge to Home or Self Care (Routine Discharge)	
492		
493		
494	SN/IC - D/T to SNF with Medicare Certification	E
495		
496	HOME - Discharge to Home or Self Care (Routine Discharge)	E
497		
498	HOME - Discharge to Home or Self Care (Routine Discharge)	E
499		
500	SN/IC - D/T to SNF with Medicare Certification	E
501		
502	HOME HEALTH SERVICES - Discharge to Home Hospice	E
503		
504	HOME - Discharge to Home or Self Care (Routine Discharge)	
505		
506	HOME - Discharge to Home or Self Care (Routine Discharge)	
507		
508	HOME - Discharge to Home or Self Care (Routine Discharge)	
509		
510	HOME - Discharge to Home or Self Care (Routine Discharge)	
511		
512	HOME - Discharge to Home or Self Care (Routine Discharge)	
513		
514	HOME - Discharge to Home or Self Care (Routine Discharge)	
515		
516	HOME - Discharge to Home or Self Care (Routine Discharge)	

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
517	REDACTED					
518	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,581.30
519	REDACTED					
520	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,038.20
521	REDACTED					
522	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,952.70
523	REDACTED					
524	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	427,934.65
525	REDACTED					
526	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	91,780.95
527	REDACTED					
528	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	88,730.35
529	REDACTED					
530	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	24,776.50
531	REDACTED					
532	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	304,594.65
533	REDACTED					
534	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	40,858.05
535	REDACTED					
536	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	786,623.42
537	REDACTED					
538	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	26,469.30
539	REDACTED					
540	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	222,682.05
541	REDACTED					
542	REDACTED					
543	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,936.00
544	REDACTED					
545	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,345.00
546	REDACTED					
547	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,696.00

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
517			REDACTED					REDACTED
518	25	Emergency			Medicare Advantage	UNK	Unknown DRG	
519								
520	14	Emergency			Self Funding	UNK	Unknown DRG	
521								
522	10	Emergency			KP Traditional	UNK	Unknown DRG	
523								
524	12	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
525								
526	8	Inpatient			Medicare Advantage	280	ACUTE MYOCARDIAL INFARCTION, DISCHARGED ALIVE W MCC	
527								
528	5	Inpatient			Medicare Advantage	329	MAJOR SMALL & LARGE BOWEL PROCEDURES W MCC	
529								
530	10	Inpatient			Medicaid	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
531								
532	7	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
533								
534	3	Inpatient			Medicare Advantage	189	PULMONARY EDEMA & RESPIRATORY FAILURE	
535								
536								
537	13	Inpatient			Commercial	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
538								
539	3	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
540								
541	11	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
542								
543	11	Emergency			KP Traditional	UNK	Unknown DRG	
544								
545	9	Emergency			KP Traditional	UNK	Unknown DRG	
546								
547	3	Emergency			KP Traditional	UNK	Unknown DRG	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
517	REDACTED	
518		Non-Health Care Facility Point of Origin
519		
520		Non-Health Care Facility Point of Origin
521		
522		Non-Health Care Facility Point of Origin
523		
524		Non-Health Care Facility Point of Origin
525		
526		Non-Health Care Facility Point of Origin
527		
528		Non-Health Care Facility Point of Origin
529		
530		Non-Health Care Facility Point of Origin
531		
532		Transfer from a Hospital (Different Facility)
533		
534		Transfer from a Hospital (Different Facility)
535		
536		
537		Non-Health Care Facility Point of Origin
538		
539		Transfer from a Hospital (Different Facility)
540		
541		Non-Health Care Facility Point of Origin
542		
543		Non-Health Care Facility Point of Origin
544		
545		Non-Health Care Facility Point of Origin
546		
547		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
517		
518	HOME - Discharge to Home or Self Care (Routine Discharge)	
519		
520	HOME - Discharge to Home or Self Care (Routine Discharge)	
521		
522	HOME - Discharge to Home or Self Care (Routine Discharge)	
523		
524	HOME - Discharge to Home or Self Care (Routine Discharge)	E
525		
526	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
527		
528	HOME - Discharge to Home or Self Care (Routine Discharge)	E
529		
530	HOME - Discharge to Home or Self Care (Routine Discharge)	E
531		
532	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
533		
534	HOME HEALTH SERVICES - Discharge to Home Hospice	E
535		
536		
537	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
538		
539	DIED - Expired	E
540		
541	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
542		
543	HOME - Discharge to Home or Self Care (Routine Discharge)	
544		
545	HOME - Discharge to Home or Self Care (Routine Discharge)	
546		
547	HOME - Discharge to Home or Self Care (Routine Discharge)	

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
548		REDACTED				
549				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,334.00
550						
551				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,571.70
552						
553				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,784.25
554						
555				V46.11	DEPENDENCE ON RESPIRATOR STATUS	844,318.35
556						
557				V46.11	DEPENDENCE ON RESPIRATOR STATUS	652,692.10
558				V46.11	DEPENDENCE ON RESPIRATOR STATUS	
559						
560				V46.11	DEPENDENCE ON RESPIRATOR STATUS	77,105.70
561						
562				V46.11	DEPENDENCE ON RESPIRATOR STATUS	310,168.65
563						
564				V46.11	DEPENDENCE ON RESPIRATOR STATUS	15,309.05
565						
566				V46.11	DEPENDENCE ON RESPIRATOR STATUS	271,139.25
567						
568				V46.11	DEPENDENCE ON RESPIRATOR STATUS	140,712.35
569						
570				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,413.00
571						
572				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,739.00
573						
574				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,125.55
575						
576				V46.11	DEPENDENCE ON RESPIRATOR STATUS	333,708.20
577						

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
548			REDACTED					REDACTED
549	14	Emergency			KP Traditional	UNK	Unknown DRG	
550								
551	16	Emergency			KP Traditional	UNK	Unknown DRG	
552								
553	11	Emergency			KP Traditional	UNK	Unknown DRG	
554								
555	13	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
556								
557	11	Inpatient			Medicare Advantage	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
558								
559								
560	5	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
561								
562	6	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
563								
564	3	Inpatient			Medicare Advantage	640	MISC DISORDERS OF NUTRITION,METABOLISM,FLUIDS/ELECTROLYTES W MCC	
565								
566	5	Inpatient			Self-Pay	963	OTHER MULTIPLE SIGNIFICANT TRAUMA W MCC	
567								
568	7	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
569								
570	7	Emergency			Medicare Advantage	UNK	Unknown DRG	
571								
572	7	Emergency			KP Traditional	UNK	Unknown DRG	
573								
574	10	Emergency			KP Traditional	UNK	Unknown DRG	
575								
576	9	Inpatient			Medicaid	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
577								

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
548	REDACTED	
549		Non-Health Care Facility Point of Origin
550		
551		Non-Health Care Facility Point of Origin
552		
553		Non-Health Care Facility Point of Origin
554		
555		Transfer from a Hospital (Different Facility)
556		
557		Non-Health Care Facility Point of Origin
558		
559		
560		Non-Health Care Facility Point of Origin
561		
562		Transfer from a Hospital (Different Facility)
563		
564		Transfer from a Hospital (Different Facility)
565		
566		Non-Health Care Facility Point of Origin
567		
568		Non-Health Care Facility Point of Origin
569		
570		Non-Health Care Facility Point of Origin
571		
572		Non-Health Care Facility Point of Origin
573		
574		Non-Health Care Facility Point of Origin
575		
576		Non-Health Care Facility Point of Origin
577		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
548		
549	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	
550		
551	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	
552		
553	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	
554		
555	SN/IC - D/T to SNF with Medicare Certification	E
556		
557	SN/IC - D/T to SNF with Medicare Certification	E
558	HOME - Discharge to Home or Self Care (Routine Discharge)	E
559		
560	DIED - Expired	E
561		
562	SN/IC - D/T to SNF with Medicare Certification	E
563		
564	SN/IC - D/T to SNF with Medicare Certification	E
565		
566	HOME - Discharge to Home or Self Care (Routine Discharge)	E
567		
568	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
569		
570	HOME - Discharge to Home or Self Care (Routine Discharge)	
571		
572	HOME - Discharge to Home or Self Care (Routine Discharge)	
573		
574	HOME - Discharge to Home or Self Care (Routine Discharge)	
575		
576	SN/IC - D/T to SNF with Medicare Certification	E
577		

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
		REDACTED		V46.11	DEPENDENCE ON RESPIRATOR STATUS	678,582.75
578						
579				V46.11	DEPENDENCE ON RESPIRATOR STATUS	0.00
580						
581				V46.11	DEPENDENCE ON RESPIRATOR STATUS	340,795.71
582						
583						
584				V46.11	DEPENDENCE ON RESPIRATOR STATUS	187,644.35
585						
586						
587				V46.11	DEPENDENCE ON RESPIRATOR STATUS	359.00
588						
589				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,450.90
590						
591				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,392.00
592						
593				V46.11	DEPENDENCE ON RESPIRATOR STATUS	11,748.52
594						
595				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,009.65
596						
597				V46.11	DEPENDENCE ON RESPIRATOR STATUS	2,170.00
598						
599						
600				V46.11	DEPENDENCE ON RESPIRATOR STATUS	52,910.30
601						
602				V46.11	DEPENDENCE ON RESPIRATOR STATUS	20,121.20
603						
604				V46.11	DEPENDENCE ON RESPIRATOR STATUS	19,309.40
605						
606				V46.11	DEPENDENCE ON RESPIRATOR STATUS	15.00
607						
608				V46.11	DEPENDENCE ON RESPIRATOR STATUS	171,295.90
609						
				V46.11	DEPENDENCE ON RESPIRATOR STATUS	95,459.70
610						
611						
612				V46.11	DEPENDENCE ON RESPIRATOR STATUS	7,038.40

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
	7	Inpatient	REDACTED		Medicaid	166	OTHER RESP SYSTEM O.R. PROCEDURES W MCC	REDACTED
578								
579								
	3	Inpatient			Medicare Advantage	189	PULMONARY EDEMA & RESPIRATORY FAILURE	
580								
581								
	10	Inpatient			Medicare	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
582								
583								
584								
	8	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
585								
586								
587	7	Emergency			Medicare Advantage	UNK	Unknown DRG	
588								
589	5	Emergency			KP Traditional	UNK	Unknown DRG	
590								
591	10	Emergency			KP Traditional	UNK	Unknown DRG	
592								
593	16	Hospital Ambulatory Surgery			Medicare Advantage	UNK	Unknown DRG	
594								
595	7	Outpatient			KP Traditional	UNK	Unknown DRG	
596								
597	5	Emergency			Medicare Advantage	UNK	Unknown DRG	
598								
599								
600	4	Inpatient			Medicare Advantage	920	COMPLICATIONS OF TREATMENT W CC	
601								
602	9	Hospital Ambulatory Surgery			KP Traditional	UNK	Unknown DRG	
603								
604	9	Hospital Ambulatory Surgery			Medicare Advantage	UNK	Unknown DRG	
605								
606	12	Hospital Ambulatory Surgery			KP Traditional	UNK	Unknown DRG	
607								
608	4	Inpatient			KP Traditional	052	SPINAL DISORDERS & INJURIES W CC/MCC	
609								
	6	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
610								
611								
612	19	Hospital Ambulatory Surgery			Medicare Advantage	UNK	Unknown DRG	

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1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
578	REDACTED	Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
579		
580		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
581		
582		Non-Health Care Facility Point of Origin
583		
584		
585		Non-Health Care Facility Point of Origin
586		
587		Non-Health Care Facility Point of Origin
588		
589		Non-Health Care Facility Point of Origin
590		
591		Non-Health Care Facility Point of Origin
592		
593		Non-Health Care Facility Point of Origin
594		
595		Non-Health Care Facility Point of Origin
596		
597		Non-Health Care Facility Point of Origin
598		
599		
600		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
601		
602		Non-Health Care Facility Point of Origin
603		
604		Non-Health Care Facility Point of Origin
605		
606		Non-Health Care Facility Point of Origin
607		
608		Transfer from a Hospital (Different Facility)
609		
610		Non-Health Care Facility Point of Origin
611		
612		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH DISPOSITION</b>	<b>POA</b>
578	SN/IC - D/T to SNF with Medicare Certification	E
579		
580		E
581		
582	OTHER CARE TO ANOTHER HOSP - D/T to an Inpt Rehab Facility (IRF) including Rehab Dist	E
583		
584		
585	SN/IC - D/T to SNF with Medicare Certification	E
586		
587	HOME - Discharge to Home or Self Care (Routine Discharge)	
588		
589	HOME - Discharge to Home or Self Care (Routine Discharge)	
590		
591	HOME - Discharge to Home or Self Care (Routine Discharge)	
592		
593	HOME - Discharge to Home or Self Care (Routine Discharge)	
594		
595	HOME - Discharge to Home or Self Care (Routine Discharge)	
596		
597	HOME - Discharge to Home or Self Care (Routine Discharge)	
598		
599		
600	SN/IC - D/T to SNF with Medicare Certification	E
601		
602	HOME - Discharge to Home or Self Care (Routine Discharge)	
603		
604	HOME - Discharge to Home or Self Care (Routine Discharge)	
605		
606	HOME - Discharge to Home or Self Care (Routine Discharge)	
607		
608	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
609		
610	DIED - Expired	E
611		
612	HOME - Discharge to Home or Self Care (Routine Discharge)	

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
613	REDACTED					
614	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	329,497.95
615	REDACTED					
616	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	77,613.00
617	REDACTED					
618	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	92,647.95
619	REDACTED					
620	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	142,253.35
621	REDACTED					
622	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	19,215.85
623	REDACTED					
624	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	55,758.15
625	REDACTED					
626	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	55,711.40
627	REDACTED					
628	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	88,230.20
629	REDACTED					
630	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	100,358.45
631	REDACTED					
632	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	18,494.50
633	REDACTED					
634	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	210,507.75
635	REDACTED					
636	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	459,510.00
637	REDACTED					
638	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	196,835.10
639	REDACTED					

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
613			REDACTED					REDACTED
614	6	Inpatient			Medicare	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
615								
616	3	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
617								
618	2	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
619								
620	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
621								
622	3	Inpatient			Medicare Advantage	640	MISC DISORDERS OF NUTRITION,METABOLISM,FLUIDS/ELECTROLYTE S W MCC	
623								
624	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
625								
626	3	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
627								
628	4	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
629								
630	6	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
631								
632								
633	2	Inpatient			Medicare Advantage	872	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W/O MCC	
634								
635	7	Inpatient			HDHP	075	VIRAL MENINGITIS W CC/MCC	
636								
637	17	Inpatient			Medicare Advantage	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	
638								
639	7	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
613	REDACTED	Non-Health Care Facility Point of Origin
614		
615		
616		Non-Health Care Facility Point of Origin
617		
618		Non-Health Care Facility Point of Origin
619		
620		Non-Health Care Facility Point of Origin
621		
		Non-Health Care Facility Point of Origin
622		
623		Non-Health Care Facility Point of Origin
624		
625		Non-Health Care Facility Point of Origin
626		
627		Non-Health Care Facility Point of Origin
628		
629		Non-Health Care Facility Point of Origin
630		
631		
632		Non-Health Care Facility Point of Origin
633		
634		Non-Health Care Facility Point of Origin
635		
636		Non-Health Care Facility Point of Origin
637		
638		Non-Health Care Facility Point of Origin
639		

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
613		
614	SN/IC - D/T to SNF with Medicare Certification	E
615		
616	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
617		
618	HOME - Discharge to Home or Self Care (Routine Discharge)	E
619		
620	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
621		
622	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
623		
624	HOME - Discharge to Home or Self Care (Routine Discharge)	E
625		
626	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
627		
628	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
629		
630	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
631		
632		
633	SN/IC - D/T to SNF with Medicare Certification	E
634		
635	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	E
636		
637	SN/IC - D/T to SNF with Medicare Certification	E
638		
639	DIED - Expired	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
640	REDACTED					
641	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	115,043.90
642	REDACTED					
643	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	116,022.55
644	REDACTED					
645	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	80,806.73
646	REDACTED					
647	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,292,424.10
648	REDACTED					
649	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	278,857.75
650	REDACTED					
651	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	64,999.00
652	REDACTED					
653	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	258,240.25
654	REDACTED					
655	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	79,404.20
656	REDACTED					
657	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	50,790.35
658	REDACTED					
659	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	410,490.80
660	REDACTED					
661	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	123,822.05
662	REDACTED					
663	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	174,700.30
664	REDACTED					
665	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,823.20
666	REDACTED					
667	REDACTED			V46.11	DEPENDENCE ON RESPIRATOR STATUS	222,562.73

	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM_DATE	DISCH_DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
640			REDACTED					REDACTED
641	9	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
642								
643	10	Inpatient			Medicare	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
644								
645	3	Inpatient			KP Traditional	163	MAJOR CHEST PROCEDURES W MCC	
646								
647	12	Inpatient			Medicare Advantage	091	OTHER DISORDERS OF NERVOUS SYSTEM W MCC	
648								
649	13	Inpatient			Self Funding	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
650								
651	7	Inpatient			Medicaid	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
652								
653	23	Inpatient			Medicare Advantage	371	MAJOR GASTROINTESTINAL DISORDERS & PERITONEAL INFECTIONS W MCC	
654								
655	2	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
656								
657	4	Inpatient			Medicare Advantage	208	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT <96 HOURS	
658								
659	11	Inpatient			KP Traditional	004	TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W/O MAJ O.R.	
660								
661	15	Inpatient			KP Traditional	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
662								
663	6	Inpatient			Medicare Advantage	207	RESPIRATORY SYSTEM DIAGNOSIS W VENTILATOR SUPPORT 96+ HOURS	
664								
665	2	Emergency			Medicare Advantage	UNK	Unknown DRG	
666								
667	5	Inpatient			Medicare Advantage	853	INFECTIOUS & PARASITIC DISEASES W O.R. PROCEDURE W MCC	

	O	P
1		
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>
640	REDACTED	
641		Non-Health Care Facility Point of Origin
642		
643		Information Not Available
644		
645		Non-Health Care Facility Point of Origin
646		
647		Transfer from a Hospital (Different Facility)
648		
649		Non-Health Care Facility Point of Origin
650		
651		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
652		
653		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
654		
655		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
656		
657		Transfer from Skilled Nursing (SNF), Intermediate Care (ICF) or Assisted Living (ALF)
658		
659		Non-Health Care Facility Point of Origin
660		
661		Clinic or Physician's Office
662		
663		Non-Health Care Facility Point of Origin
664		
665		Non-Health Care Facility Point of Origin
666		
667		Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
640		
641	SN/IC - D/T to SNF with Medicare Certification	E
642		
643	DIED - Expired	E
644		
645	HOME - Discharge to Home or Self Care (Routine Discharge)	E
646		
647	DIED - Expired	E
648		
649	DIED - Expired	E
650		
651	SN/IC - D/T to SNF with Medicare Certification	E
652		
653	DIED - Expired	E
654		
655	DIED - Expired	E
656		
657	SN/IC - D/T to SNF with Medicare Certification	E
658		
659	SN/IC - D/T to SNF with Medicare Certification	E
660		
661	DIED - Expired	E
662		
663	SN/IC - D/T to SNF with Medicare Certification	E
664		
665	HOME - Discharge to Home or Self Care (Routine Discharge)	
666		
667	DIED - Expired	E

	A	B	C	D	E	F
1	NCHIM0009 DX IN ANY POSITION DETAIL	Medical Center Area: ALL	DX Codes: V46.11	Discharge From dates :	REDACTED	
2	<b>HAR_ACCOUNT_ID</b>	<b>PATIENT_MRN</b>	<b>PAT_NAME</b>	<b>ICD_CODE</b>	<b>DX_NAME</b>	<b>TOT_CHGS</b>
668		REDACTED				
669				V46.11	DEPENDENCE ON RESPIRATOR STATUS	161,733.20
670						
671				V46.11	DEPENDENCE ON RESPIRATOR STATUS	167,606.90
672						
673				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,496.35
674						
675				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,232.30
676						
677				V46.11	DEPENDENCE ON RESPIRATOR STATUS	12,117.55
678						
679				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,915.30
680						
681				V46.11	DEPENDENCE ON RESPIRATOR STATUS	4,336.90
682						
683				V46.11	DEPENDENCE ON RESPIRATOR STATUS	3,188.10
684						
685				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,025.00
686						
687				V46.11	DEPENDENCE ON RESPIRATOR STATUS	1,947.00
688						
689				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,396.80
690						
691				V46.11	DEPENDENCE ON RESPIRATOR STATUS	5,850.00
692						
693				V46.11	DEPENDENCE ON RESPIRATOR STATUS	977.00
694						
695				V46.11	DEPENDENCE ON RESPIRATOR STATUS	23,890.15
696						
697				V46.11	DEPENDENCE ON RESPIRATOR STATUS	51,665.20
698						
699				V46.11	DEPENDENCE ON RESPIRATOR STATUS	291,485.22

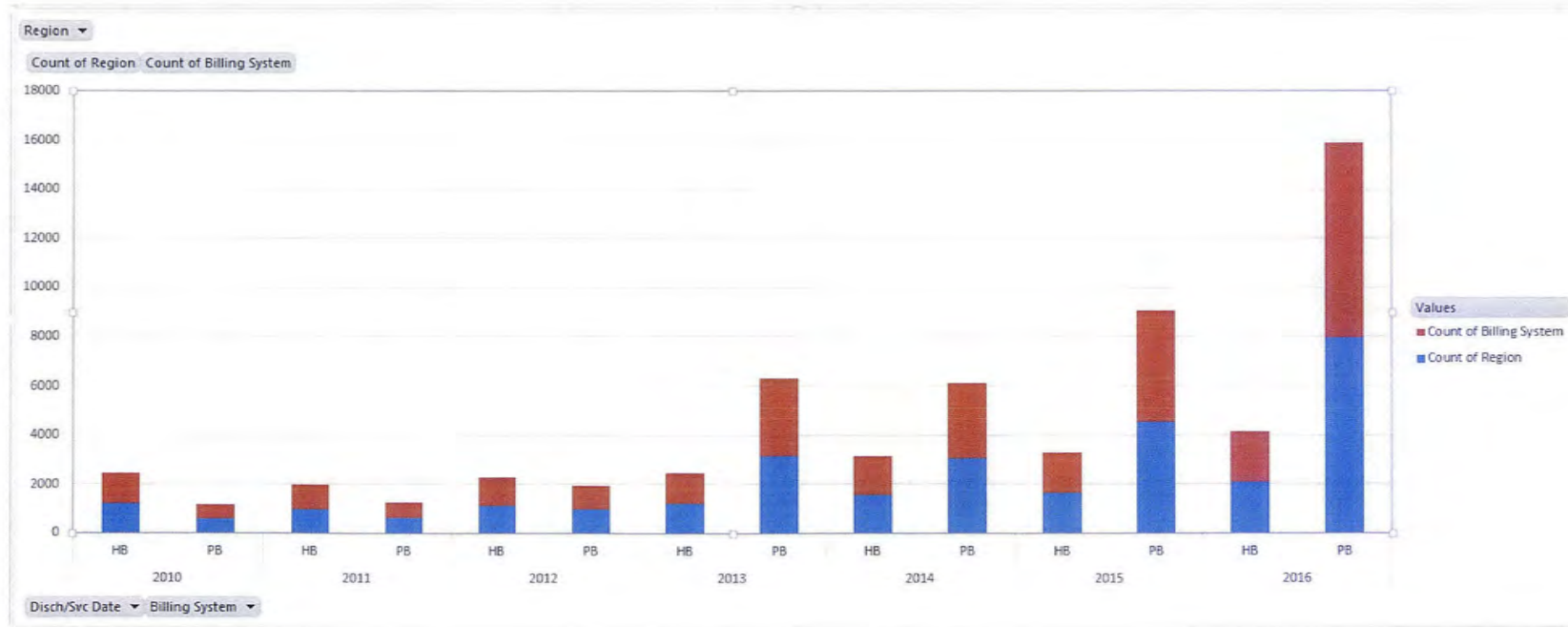
	G	H	I	J	K	L	M	N
1								
2	DX_POS	ACCT_CLASS	ADM DATE	DISCH DATE	LOB_NAME	DRG_NUMBER	DRG_DESCRIPTION	ATTENDING_PROV_ID
668			REDACTED					REDACTED
669	13	Inpatient			Medicare Advantage	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
670								
671	4	Inpatient			KP DHMO	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
672								
673	26	Emergency			Medicare Advantage	UNK	Unknown DRG	
674								
675	15	Emergency			KP Traditional	UNK	Unknown DRG	
676								
677	9	Emergency			Medicare Advantage	UNK	Unknown DRG	
678								
679	25	Emergency			Medicare Advantage	UNK	Unknown DRG	
680								
681	19	Emergency			Medicare Advantage	UNK	Unknown DRG	
682								
683	10	Emergency			KP Traditional	UNK	Unknown DRG	
684								
685	18	Emergency			Medicare Advantage	UNK	Unknown DRG	
686								
687	31	Emergency			Medicare Advantage	UNK	Unknown DRG	
688								
689	10	Emergency			Medicare Advantage	UNK	Unknown DRG	
690								
691	11	Emergency			KP Traditional	UNK	Unknown DRG	
692								
693	6	Emergency			Medicare Advantage	UNK	Unknown DRG	
694								
695	4	Inpatient			KP DHMO	871	SEPTICEMIA OR SEVERE SEPSIS W/O MV 96+ HOURS W MCC	
696								
697	3	Inpatient			Medicare Advantage	870	SEPTICEMIA OR SEVERE SEPSIS W MV 96+ HOURS	
698								
699	12	Inpatient			Medicare Cost	003	ECMO OR TRACH W MV 96+ HRS OR PDX EXC FACE, MOUTH & NECK W MAJ O.R.	

	O	P													
1															
2	<b>PROV_NAME</b>	<b>ADMIT_SRC</b>													
668	REDACTED														
		Non-Health Care Facility Point of Origin													
669		REDACTED													
670			Non-Health Care Facility Point of Origin												
671			REDACTED												
672				Non-Health Care Facility Point of Origin											
673				REDACTED											
674					Non-Health Care Facility Point of Origin										
675					REDACTED										
676						Non-Health Care Facility Point of Origin									
677						REDACTED									
678							Non-Health Care Facility Point of Origin								
679							REDACTED								
680								Non-Health Care Facility Point of Origin							
681								REDACTED							
682									Non-Health Care Facility Point of Origin						
683									REDACTED						
684										Non-Health Care Facility Point of Origin					
685										REDACTED					
686											Non-Health Care Facility Point of Origin				
687											REDACTED				
688												Non-Health Care Facility Point of Origin			
689												REDACTED			
690													Non-Health Care Facility Point of Origin		
691													REDACTED		
692														Non-Health Care Facility Point of Origin	
693														REDACTED	Clinic or Physician's Office
694															
695	REDACTED														Non-Health Care Facility Point of Origin
696															
697		REDACTED													Non-Health Care Facility Point of Origin
698															
699			REDACTED												Non-Health Care Facility Point of Origin

	Q	R
1		
2	<b>DISCH_DISPOSITION</b>	<b>POA</b>
668		
669	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E
670		
671	SN/IC - D/T to SNF with Medicare Certification	E
672		
673	HOME - Discharge to Home or Self Care (Routine Discharge)	
674		
675	HOME - Discharge to Home or Self Care (Routine Discharge)	
676		
677	HOME - Discharge to Home or Self Care (Routine Discharge)	
678		
679	OTHER CARE W/I THIS HOSP - Admitted as an Inpt to this Hosp	
680		
681	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	
682		
683	HOME - Discharge to Home or Self Care (Routine Discharge)	
684		
685	HOME - Discharge to Home or Self Care (Routine Discharge)	
686		
687	HOME - Discharge to Home or Self Care (Routine Discharge)	
688		
689	ACUTE CARE TO ANOTHER HOSP - D/T to Another Short Term	
690		
691	HOME - Discharge to Home or Self Care (Routine Discharge)	
692		
693	HOME - Discharge to Home or Self Care (Routine Discharge)	
694		
695	SN/IC - D/T to SNF with Medicare Certification	E
696		
697	SN/IC - D/T to SNF with Medicare Certification	E
698		
699	HOME HEALTH SERVICE - D/T to Home Under Care of Organized Home Health Service Organiz	E

# **EXHIBIT 28**

# ALL REGIONS: 2010-2016 Volumes – Vent Dependence Code

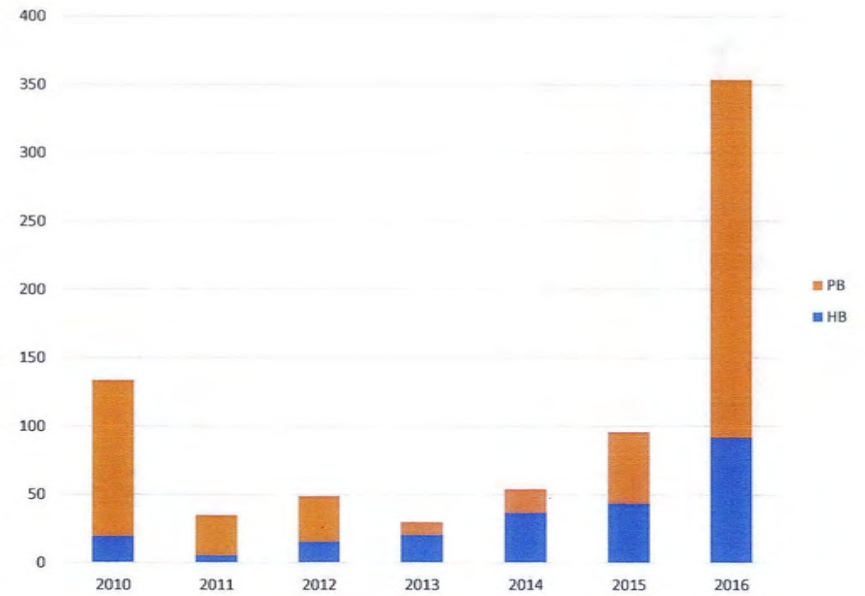


# ALL REGIONS: 2010-2016

Region	(All)		
Row Labels	Count of Region	Count of Billing System	
2010		1811	1811
HB		1224	1224
PB		587	587
2011		1633	1633
HB		1001	1001
PB		632	632
2012		2101	2101
HB		1130	1130
PB		971	971
2013		4393	4393
HB		1238	1238
PB		3155	3155
2014		4625	4625
HB		1563	1563
PB		3062	3062
2015		6176	6176
HB		1652	1652
PB		4524	4524
2016		10015	10015
HB		2072	2072
PB		7943	7943
Grand Total		30754	30754

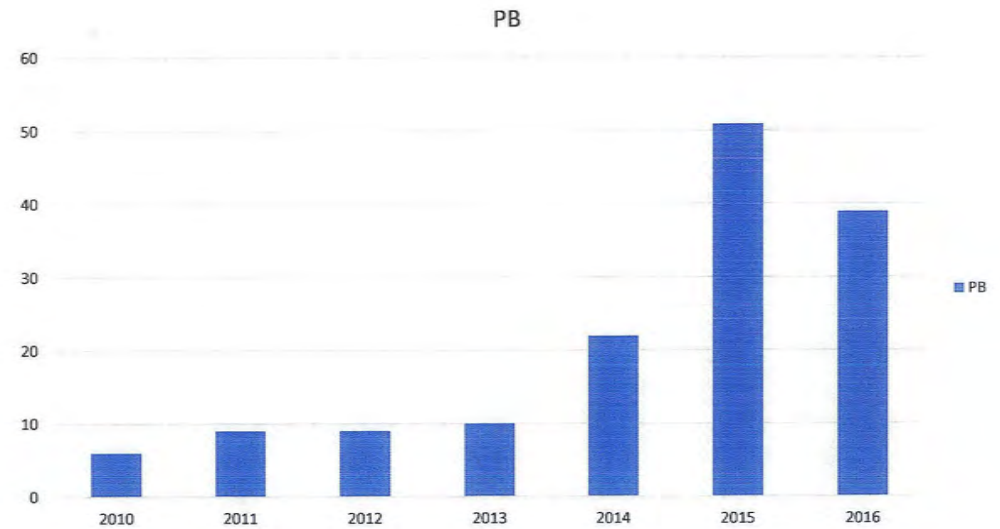
# NW REGION

NW Vent Dependence Code			
Count of Diagnosis	Column Labels		
Row Labels	HB	PB	Grand Total
2010		20	114
2011		6	29
2012		16	33
2013		21	9
2014		37	17
2015		44	52
2016		92	262
Grand Total		236	516



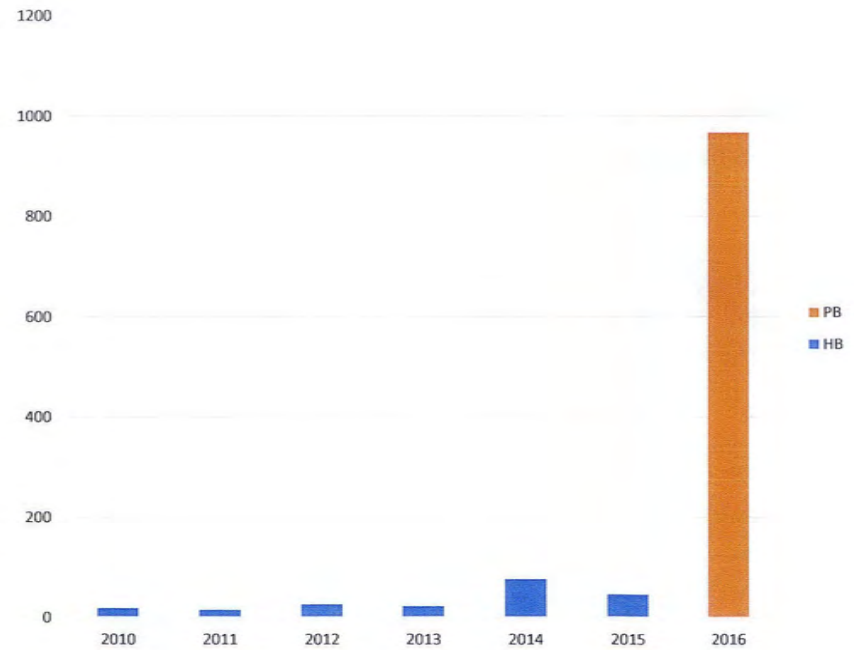
# MAS REGION

MAS Vent Dependence Code	Count of Diagnosis	Column Labels	Grand Total
Row Labels	PB		
2010	6		6
2011	9		9
2012	9		9
2013	10		10
2014	22		22
2015	51		51
2016	39		39
<b>Grand Total</b>	<b>146</b>		<b>146</b>



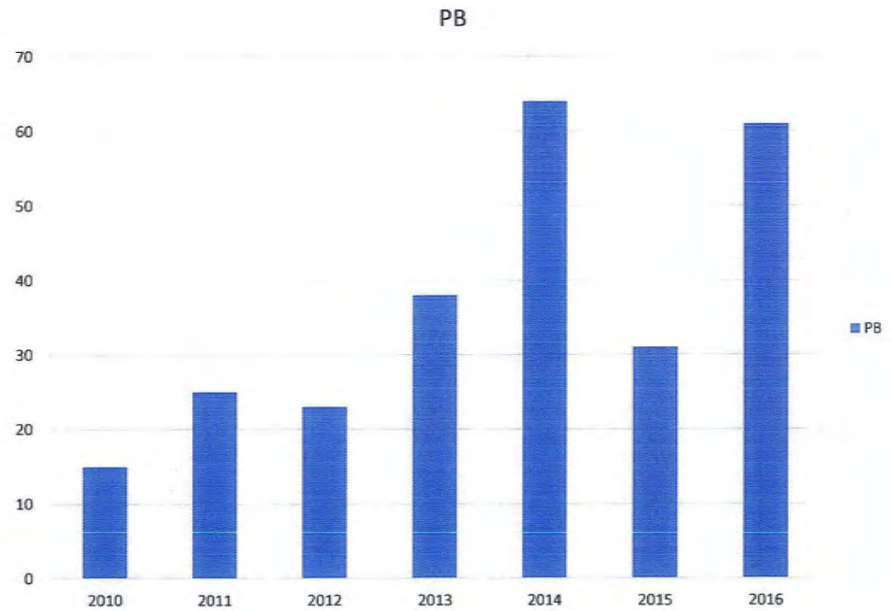
# HI REGION

HI Vent Dependence Code			
Count of Diagnosis	Column Labels		
Row Labels	HB	PB	Grand Total
2010		18	18
2011		15	15
2012		26	26
2013		22	22
2014		76	76
2015		46	46
2016		968	968
Grand Total	203	968	1171



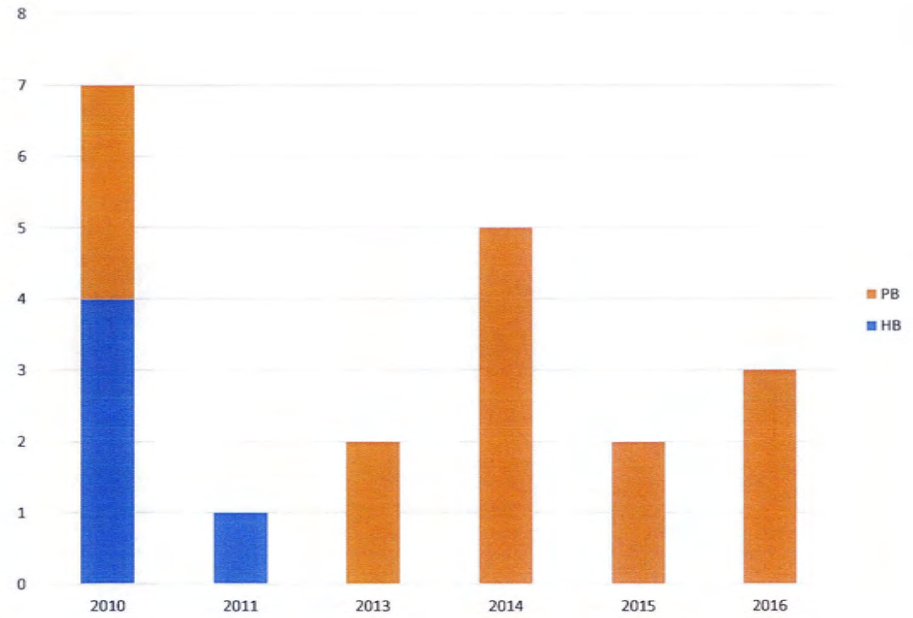
# GA Region

GA Vent Dependence Code			
Count of Diagnosis	Column Labels		
Row Labels	PB	Grand Total	
2010	15	15	
2011	25	25	
2012	23	23	
2013	38	38	
2014	64	64	
2015	31	31	
2016	61	61	
Grand Total	257	257	



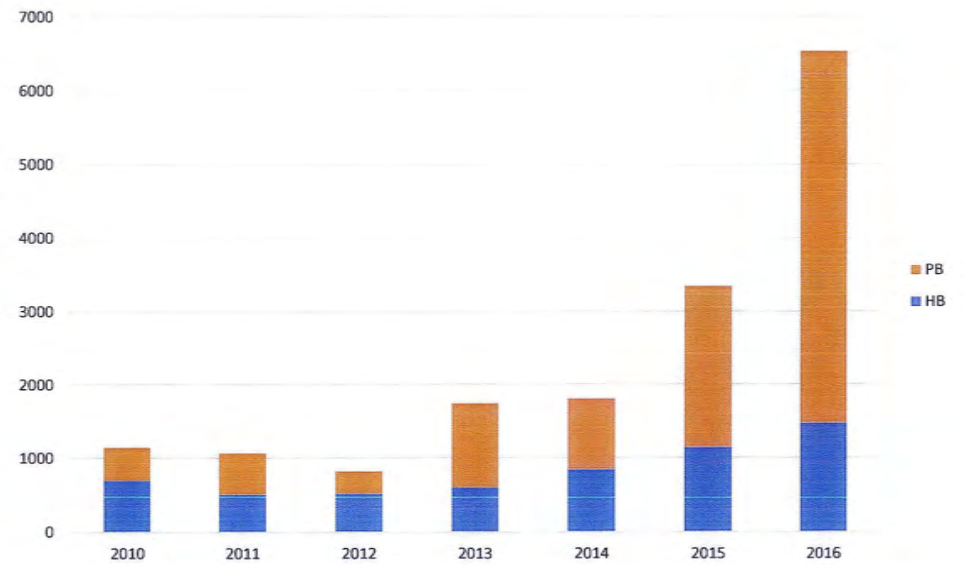
# CO Region

CO Count of Diagnosis Row Labels	Vent Dependence Code Column Labels		
	HB	PB	Grand Total
2010	4	3	7
2011	1		1
2013		2	2
2014		5	5
2015		2	2
2016		3	3
Grand Total	5	15	20



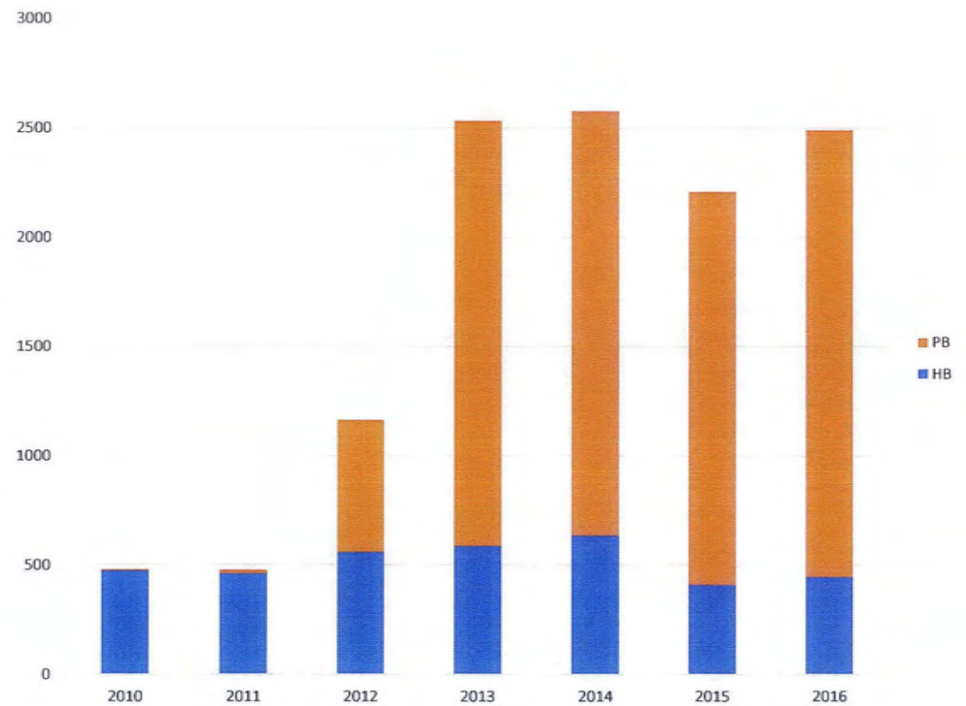
# SCAL REGION

SCAL				
Vent Dependence Code				
Count of Diagnosis	Column Labels			
Row Labels	HB	PB	Grand Total	
2010		706	441	1147
2011		516	552	1068
2012		527	295	822
2013		606	1137	1743
2014		854	951	1805
2015		1155	2188	3343
2016		1483	5048	6531
Grand Total		5847	10612	16459



# NCAL REGION

Vent Dependence Code	NCAL		
Count of Diagnosis	Column Labels		
Row Labels	HB	PB	Grand Total
2010	476	6	482
2011	463	17	480
2012	561	607	1168
2013	589	1946	2535
2014	637	1943	2580
2015	412	1799	2211
2016	451	2042	2493
Grand Total	3589	8360	11949



# **EXHIBIT 29**



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## American Health Information Management Association Standards of Ethical Coding

### Introduction

Coding is recognized as one of the core health information management (HIM) functions within healthcare. Due to the complex regulatory requirements affecting the health information coding process, coding professionals are frequently faced with ethical coding and coding-related challenges. The Standards of Ethical Coding are **important** established guidelines for any coding professional and are based on the American Health Information Management Association's (AHIMA's) Code of Ethics. Both reflect expectations of professional conduct for coding professionals involved in diagnostic and/or procedural coding, data abstraction and related coding and/or data activities.

A Code of Ethics sets forth professional values and ethical principles. In addition, a code of ethics offers ethical guidelines to which professionals aspire and by which their actions can be expected and be judged. HIM and coding professionals are expected to demonstrate professional values by their actions to patients, employers, members of the healthcare team, the public, and the many stakeholders they serve. A Code of Ethics is important in helping guide the decision-making process and can be referenced by individuals, agencies, organizations, and bodies (such as licensing and regulatory boards, insurance providers, courts of law, government agencies, and other professional groups). The Code of Ethics<sup>1</sup> is relevant to all AHIMA members, students, and CCHIIM credentialed HIM and coding professionals, regardless of their professional functions, the settings in which they work, or the populations they serve. All core health information coding activities are performed in compliance with state and federal regulations, and employer policies and procedures.<sup>2</sup>

The AHIMA Standards of Ethical Coding are intended to assist and guide coding professionals whether credentialed or not; including but not limited to coding staff, coding auditors, coding educators, clinical documentation improvement (CDI) professionals, and managers responsible for decision-making processes and operations as well as HIM/coding students. The standards outline expectations for making ethical decisions in the workplace and demonstrate coding professionals' commitment to integrity during the coding process, regardless of the purpose for which the codes are being reported. They are relevant to all coding professionals, regardless of the healthcare setting (e.g., inpatient, outpatient, post-acute care, alternative care, etc.) in which they work or function.

These Standards of Ethical Coding have been revised in order to reflect the current healthcare environment and modern coding practices. This document is in two parts; part one includes the standards and part two contains the standards, guidelines, and examples. Additionally, definitions have been added for some key words and terms used throughout the document. The following definitions relate to and are used within the context of these Standards for consistency and continuity.

### DEFINITIONS

The purpose of this definition section is to achieve clarity without needless repetition. These definitions are intended to reflect everyday meaning. It is not within the scope of this document to establish new definitions for the words.

**Coding Professional:** Individuals whether credentialed or not; including but not limited to coding staff, coding auditors, coding educators, clinical documentation improvement (CDI) professionals, and managers responsible for decision-making processes and operations as well as HIM/coding students.

**Coding-related activities:** The activities includes selection, research, and completion of code assignment, querying, other health record data abstraction, data analytics and reporting with codes, coding audits, remote coding, and coding educational activities and functions.

**Data:** All healthcare data elements including clinical, demographic, and financial.

Documentation: Clinical documentation found in the health record (medical record) in any format.

Encounter: The term *encounter* is used for all settings, including hospital admissions. All healthcare settings include the following: hospitals (inpatient and outpatient), physician offices, post-acute care (e.g., long- and short-term care), and other non-acute care (e.g., home health, hospice).

Established practices: Refers to processes and methods that are recognized and generally accepted such as AHIMA practice briefs and accrediting body standards.

Healthcare professionals: Those who are educated and skilled in any aspect of healthcare including direct and indirect patient care.

Provider: The term provider is used throughout the guidelines to mean physician or any qualified healthcare practitioner who is legally accountable for establishing the patient's diagnosis.

Query: A clarification or question to the provider through written, verbal, or electronic means regarding or related to clinical documentation in the health record.

Requirements: ICD coding conventions, official coding and reporting guidelines approved by the Cooperating Parties, the CPT rules established by the American Medical Association, applicable state and federal regulations, and any other official coding rules and guidelines (e.g., AHA Coding Clinic ICD-10-CM/PCS; AHA Coding Clinic for HCPCS; AMA CPT Assistant; AMA CPT Code book) established for use with mandated standard code sets.

## **Standards of Ethical Coding**

1. Apply accurate, complete, and consistent coding practices that yield quality data.
2. Gather and report all data required for internal and external reporting, in accordance with applicable requirements and data set definitions.
3. Assign and report, in any format, only the codes and data that are clearly and consistently supported by health record documentation in accordance with applicable code set and abstraction conventions, and requirements.
4. Query and/or consult as needed with the provider for clarification and additional documentation prior to final code assignment in accordance with acceptable healthcare industry practices.
5. Refuse to participate in, support, or change reported data and/or narrative titles, billing data, clinical documentation practices, or any coding related activities intended to skew or misrepresent data and their meaning that do not comply with requirements.
6. Facilitate, advocate, and collaborate with healthcare professionals in the pursuit of accurate, complete and reliable coded data and in situations that support ethical coding practices.
7. Advance coding knowledge and practice through continuing education, including but not limited to meeting continuing education requirements.
8. Maintain the confidentiality of protected health information in accordance with the Code of Ethics.<sup>3</sup>
9. Refuse to participate in the development of coding and coding related technology that is not designed in accordance with requirements.
10. Demonstrate behavior that reflects integrity, shows a commitment to ethical and legal coding practices, and fosters trust in professional activities.
11. Refuse to participate in and/or conceal unethical coding, data abstraction, query practices, or any inappropriate activities related to coding and address any perceived unethical coding related practices.

## **The Standards for Ethical Coding and How to Interpret the Standards of Ethical Coding**

### **Standards and Guidelines**

The following ethical standards are based on the core values of the American Health Information Management Association in the AHIMA Code of Ethics and apply to all coding professionals. Guidelines for each ethical standard are a non-inclusive list of behaviors and situations that can help to clarify the standard. They are not meant to be a comprehensive list of all situations that can occur.

1. Apply accurate, complete, and consistent coding practices that yield quality data.

Coding professionals shall:

- 1.1. Support selection of appropriate diagnostic, procedure, and other types of health service related codes (e.g., present on admission indicator, discharge status).

- 1.2. Develop and comply with comprehensive internal coding policies and procedures that are consistent with requirements.

Example: Develop internal policies and procedures for the coding function such as Facility Coding Guidelines that do not conflict with the Requirements and use as a framework for the work process, and education and training is provided on their use.

- 1.3. Foster an environment that supports honest and ethical coding practices resulting in accurate and reliable data.

Example: Regularly discussing the standards of ethical coding at staff meetings.

Coding professionals **shall not**:

- 1.4. Distort or participate in improper preparation, alteration, or suppression of coded information.

Example: Assigning diagnosis and/or procedure codes based on clinical documentation not recognized in requirements (as defined above in the definitions).

- 1.5. Misrepresent the patient's medical conditions and/or treatment provided, are not supported by the health record documentation.

Example: Permitting coding practices that misrepresent the provider documentation for a given date of service or encounter such as using codes from a previous encounter on the current encounter (except with bundled payment models or other methodologies).

2. Gather and report all data required for internal and external reporting, in accordance with applicable requirements and data set definitions.

Coding professionals **shall**:

- 2.1. Adhere to the ICD coding conventions, official coding and reporting guidelines approved by the Cooperating Parties, the CPT rules established by the American Medical Association, and any other official coding rules and guidelines established for use with mandated standard code sets.

Example: Using current and/or appropriate resource tools that assist with proper sequencing and reporting to stay in compliance with existing reporting requirements.

- 2.2. Select and sequence diagnosis and procedure codes, present on admission, discharge status in accordance with the definitions of required data sets in all healthcare settings.

3. Assign and report, in any format, only the codes and data that are clearly and consistently supported by health record documentation in accordance with applicable code set and abstraction conventions, and requirements.

Coding professionals **shall**:

- 3.1. Apply skills, knowledge of currently mandated coding and classification systems, and official resources to select the appropriate diagnostic and procedural codes (including applicable modifiers), and other codes representing healthcare services (including substances, equipment, supplies, or other items used in the provision of healthcare services).

Example: Researching and/or confirming the appropriate code for a clinical condition when not indexed in the classification.

4. Query and/or consult as needed with the provider for clarification and additional documentation prior to final code assignment in accordance with acceptable healthcare industry practices.

Coding professionals **shall**:

4.1. Participate in the development of query policies that support documentation improvement and meet regulatory, legal, and ethical standards for coding and reporting.

Example: Guidelines for Achieving a Compliant Query Practice (2016 Update)<sup>3</sup>

4.2. Use queries as a communication tool to improve the accuracy of code assignment and the quality of health record documentation.

Example: Designing and adhering to policies regarding the circumstances when providers should be queried to promote complete and accurate coding and complete documentation, regardless of whether reimbursement will be affected.

Example: In some situations a query to the provider will be initiated after the initial completion of the coding due to late documentation, etc., this should be conducted in a timely manner.

4.3 Query with established practice brief guidance when there is conflicting, incomplete, illegible, imprecise, or ambiguous information, (e.g., concurrent, pre-bill, and retrospective).

Coding professionals **shall not**:

4.4. Query the provider when there is no clinical information in the health record that necessitates a query.

Example: Querying the provider regarding the presence of gram-negative pneumonia on every pneumonia case/encounter.

4.5. Utilize health record documentation from or in other encounters to generate a provider query.

5. Refuse to participate in, support or change reported data and/or narrative titles, billing data, clinical documentation practices, or any coding related activities intended to skew or misrepresent data and their meaning that do not comply with requirements.

Coding professionals **shall**:

5.1. Select and sequence the codes such that the organization receives the optimal reimbursement to which the facility is legally entitled, remembering that it is unethical and illegal to increase reimbursement by means that contradict requirements.

5.2. Bring to the attention of the organization management any identified inappropriate coding practices that do not comply with requirements.

Example: Communicating with management and/or utilize organization's compliance hot line to report inappropriate coding practices.

Example: Bringing coding errors to the attention of the administration and/or coding leadership as soon as possible.

Coding professionals **shall not**:

5.3. Misrepresent the patient's clinical picture through intentional incorrect coding or omission of diagnosis or procedure codes, or the addition of diagnosis or procedure codes unsupported by health record documentation, to inappropriately increase reimbursement, justify medical necessity, improve publicly reported data, or qualify for insurance policy coverage benefits.

Example: Changing a code at the patient's and/or business office's request so that the service will be covered by the patient's insurance when not supported by the clinical documentation and /or requirements.

5.4. Exclude diagnosis or procedure codes inappropriately in order to misrepresent the quality of care provided.

Example: Omitting and/or altering a code to misrepresent the quality outcomes or metrics that is not supported by clinical documentation and requirements.

Example: Reporting codes for quality outcomes that inaccurately improve a healthcare organization's quality profile or pay-for-performance results (e.g. POA, risk adjustment methodologies).

6. Facilitate, advocate, and collaborate with healthcare professionals in the pursuit of accurate, complete and reliable coded data and in situations that support ethical coding practices.

Coding professionals **shall**:

- 6.1. Assist with and educate providers, clinicians, and others by advocating proper documentation practices and further specificity for both diagnoses and procedures when needed to more precisely reflect the acuity, severity, and the occurrence of events.

Example: Providing regular education sessions on new requirements or requirement changes.

Example: Reviewing and sharing requirements and Standards for Ethical Coding with providers, clinicians, and others.

7. Advance coding knowledge and practice through continuing education, including but not limited to meeting continuing education requirements.

Coding professionals **shall**:

- 7.1. Maintain and continually enhance coding competencies in order to stay abreast of changes in codes, documentation, and coding requirements.

Example: Participating in educational programs, reading required publications, and maintaining professional certifications.

8. Maintain the confidentiality of protected health information in accordance with the Code of Ethics.<sup>4</sup>

Coding professionals **shall**:

- 8.1. Protect all confidential information obtained in the course of professional service, including personal, health, financial, genetic, and outcome information.

- 8.2. Access only that information necessary to perform their duties.

- 8.3. Maintain a remote coding work area that protects confidential health information.

Example: Health information should be protected from public and/or family viewing.

9. Refuse to participate in the development of coding and coding related technology that is not designed in accordance with requirements.

Coding professionals **shall**:

- 9.1. Utilize all tools, both electronic and hard copy that are available to ensure accurate code assignment.

- 9.2. Recognize that computer assisted coding (CAC) and/or electronic encoders are only tools and are not a substitute for the coding professional's judgment.

- 9.3. Utilize electronic code and code title selection technology in a manner that is compliant with coding requirements.

10. Demonstrate behavior that reflects integrity, shows a commitment to ethical and legal coding practices, and fosters trust in professional activities.

Coding professionals **shall**:

- 10.1. Act in an honest manner and bring honor to self, peers, and the profession.

- 10.2. Represent truthfully and accurately their credentials, professional education, and experience.

- 10.3. Demonstrate ethical principles and professional values in their actions to patients, employers, other members of the healthcare team, consumers, and other stakeholders served by the healthcare data they collect and report.

11. Refuse to participate in and/or conceal unethical coding, data abstraction, query practices, or any inappropriate activities related to coding and address any perceived unethical coding related practices.

Coding professionals **shall**:

11.1. Act in a professional and ethical manner at all times.

11.2. Take adequate measures to discourage, prevent, expose, and correct the unethical conduct of colleagues.

11.3. Be knowledgeable about established policies and procedures for handling concerns about colleagues' unethical behavior. These include policies and procedures created by AHIMA, licensing and regulatory bodies, employers, supervisors, agencies, and other professional organizations.

11.4. Seek resolution if there is a belief that a colleague(s) has acted unethically or if there is a belief of incompetence or impairment by discussing concerns with the colleague(s) when feasible and when such discussion is likely to be productive.

Example: Taking action through appropriate formal channels (i.e., internal escalation process or compliance hot line, and/or contact an accreditation or regulatory body, and/or the AHIMA Professional Ethics Committee).

11.5. Consult with a colleague(s) when feasible and assist the colleague(s) in taking remedial action when there is direct knowledge of a health information management colleague's incompetence or impairment.

Coding professionals **shall not**:

11.6. Participate in, condone, or be associated with dishonesty, fraud and abuse, or deception. A non-exhaustive list of examples includes:

- Participating in or allowing inappropriate patterns of retrospective documentation to avoid suspension and/or increase reimbursement
- Coding an inappropriate level of service
- Miscoding to avoid conflict with others
- Adding, deleting, and altering health record documentation
- Coding from documentation that is Copied and pasted from another clinician's documentation without identification of the original author and date
- Engaging in and supporting negligent coding practices
- Participating in or allowing inappropriate retrospective provider querying.
- Reporting a code for the sake of convenience or to affect reporting for a desired effect on the results

Revised and approved by the House of Delegates December 12, 2016.

## Footnotes

1. [Code of Ethics](#), October 2, 2011
2. Ibid.
3. [Guidelines for Achieving a Compliant Query Practice \(2016 Update\)](#)
4. Code of Ethics. Principle III.

## Resources

[Code of Ethics](#)

[Ethical Standards for Clinical Documentation Improvement \(CDI\) Professionals](#)

[ICD-10-CM Official Guidelines for Coding and Reporting](#)

[ICD-10-PCS Official Guidelines for Coding and Reporting](#)

# **EXHIBIT 30**

From: Nancy J Andersen/CA/KAIPERM  
To: Teresa S Welsh/CO/KAIPERM@KAIPERM  
Cc: James M Taylor/CO/KAIPERM@KAIPERM  
Date: 10/15/2013 12:50 PM  
Subject: CO Region Physician Query for Severe Obesity

---

Hi Dr. Welsh,

I just left you a voice message a few minutes ago regarding my interest in talking with you about the CO region's approach to the physician query process.

I attended the recent RRG meeting and was very interested in your presentation on CO region's approach to capturing the diagnosis of severe (morbid) obesity through the use of the Medicare Query function in HealthConnect. As a long time health information management professional, I am very familiar with the physician query process and applaud CO region's efforts to effectively document clinically appropriate diagnoses.

I do have a couple of concerns regarding the query language used and how it may be viewed by CMS and the OIG.

**REL0000510**

The issue of "leading" physician queries is not a new topic of discussion within the healthcare community and in fact there have been many articles published about the appropriate query language to use as well as a Practice Brief from the American Health Information Management Association (AHIMA) which I've attached for your reference.

Industry standards regarding the use of physician queries generally follow the AHIMA Practice Brief, which in part states the following:

"It is recommended that queries be written with precise language, identifying clinical indications from the health record and asking the provider to make a clinical interpretation of these facts based on his or her professional judgment of the case. Queries that appear to lead the provider to document a particular response could result in allegations of inappropriate upcoding. The query format should not sound presumptive, directing, prodding, probing, or as though the provider is being led to make an assumption."

The language of concern on the slide below - "this patient has a suspected diagnosis" introduces a diagnosis or suspected diagnosis not previously mentioned by the provider and from a compliance perspective may be interpreted as "leading". Additionally, the provider must also be given the option in their response to a query to state the clinical indicator, in this case a BMI value, is not significant or the significance is not known. The query below appears to be directive in nature, indicating what the provider should document, rather than querying the provider for his or her professional determination of the clinical facts.

Regulation of Queries: The coding and reporting guidelines adopted by HHS by regulation those guidelines have the force of law once adopted by HHS. While the *Official ICD-9-CM Guidelines for Coding and Reporting* had previously been approved by the ICD-9-CM Cooperating Parties: CMS, the American Hospital Association (AHA), American Health Information Management Association (AHIMA), and the National Center for Health Statistics (NCHS), those guidelines have the force of law once adopted by HHS.

The Official Coding Guidelines do allow queries to be written when a diagnosis is not clearly documented and clarification is required. A query may be initiated when there is conflicting, incomplete, or ambiguous documentation in the health record. In an October 11, 2001 memorandum, CMS clarified its position. As described by the Texas Medical Foundation (TMF) Quality Institute, the quality integrity organization (QIO) for Texas, CMS said: "*Use of the physician query form is permissible to the extent it provides clarification and is consistent with other medical record documentation.*"

CMS's position is that a query form should not

- be leading
- introduce new information not otherwise contained in the medical record

Dear Dr. \*\*\*,

This patient has Suspected Diagnosis: Severe Obesity

Supporting Data: BMI >=40.

- If you agree that this data indicates a diagnosis that should be documented, please:
- Double click above to open the chart as an addendum.
- Add the diagnosis to the diagnosis entry field.
- Slide all chronic diagnoses over to the problem list.
- Add supporting data or other documentation into the progress note, if indicated.
- FYI: Please use your clinical judgment in addition to the data provided to determine the correct diagnosis. If the suspected diagnosis was not evaluated, managed, or considered during this particular encounter, please update the problem list and make a plan to address it at the next visit with this patient. If the diagnosis suspected is not correct, please delete this query. This query was sent to you as a part of routine Panel Support to improve clinical documentation. If you have any questions about the Medicare Query process or the Panel Support Reviews, please reply, or forward questions to Teresa Welsh MD.
- Thank you,
- Medicare Risk Auditor

Attached are two slides with examples of compliant language which I hope you will find helpful. The revised language will not be considered "leading" while I believe still retaining the original intent of your query forms.

Please let me know a convenient time for a discussion regarding how best to ensure the capture of all appropriate diagnoses while maintaining a compliant physician query process for your region.

Warm Regards,

Nancy J Andersen MS RHIA CCS CRCR AHIMA-Approved ICD-10-CM/PCS Trainer  
Senior Compliance Manager Care Delivery and Health Information Management  
National Compliance Ethics and Integrity Office  
Kaiser Foundation Health Plan Inc

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*Embed a culture of compliance across the care delivery enterprise that inspires the highest level of ethics and integrity*

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# **EXHIBIT 31**

1. NW-CDI\_Angina
2. NW-CDI\_Art Open
3. NW-CDI\_CHF
4. NW-CDI\_CVA
5. NW-CDI\_Delirium
6. NW-CDI\_DM
7. NW-CDI\_DM Comp
8. NW-CDI DM Dyslipidemia
9. NW-CDI\_MI
10. NW-CDI\_PCM
11. NW-CDI\_PNA
12. NW-CDI\_RENAL
13. NW-CDI\_RESP
14. NW-CDI\_SEPSIS
15. NW-CDI\_SIRS
16. NW-CDI\_SKIN
17. NW-CDI\_Urosepsis
18. NW-CDI\_AA
19. NW-CDI\_BMI
20. NW-CDI\_NICU-NEC
21. NW-CDI\_NICU-FGR
22. NW-CDI\_NICU-DIC
23. NW-CDI\_NICU-Aspiration
24. NW-CDI\_NICU-RDS
25. NW-CDI\_NICU-PNA
26. NW-CDI\_NICU-CRD
27. NW-CDI\_NICU-ARF
28. NW-CDI\_NICU-SIRS
29. NW-CDI\_NICU-SEPSIS
30. NW-CDI\_General
31. NW-CDI\_PVD
32. NW-CDI\_C Edema
33. NW-CDI\_DI Neutropenia
34. NW-CDI\_Pancytopenia
35. NW-CDI\_Aneurysm
36. NW\_CDI\_NICU Blood Group

**MOST OF THESE QUERIES DO NOT PROVIDE ADDITIONAL OPTIONS FOR THE PROVIDER AS DIRECTED BY THE AHIMA PRACTICE BRIEF ON ACHIEVING A COMPLIANT QUERY PROCESS (i.e. "clinically undetermined", "unknown", etc.**

NW-CDI\_ ANGINA

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Angina Pectoris  
(New onset, Stable, typical, atypical)

Prinzmetal angina  
Angina Decubitus (nocturnal angina)

Other (please specify)

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

By directing the physician to "update the Problem List", this diagnosis will carry over in KPHC (EHR) and always appear in future visits, even if not related. Many records display "old" conditions with missing "treatment date".

NW-CDI\_ Art Open

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

To more accurately assign the correct diagnosis code; please respond to the following by documenting:

Location (colostomy, tracheostomy, etc)

Size or Type, if applicable

Specify if complication (infection, mechanical)

Status (stable, functional)

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

**NW-CDI\_ CHF**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient. The presence of any Variant of Heart Failure (CHF) was documented in the \_\_\_\_\_ dated \_\_\_\_\_.

Based on your independent professional judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

- |                                    |                                       |
|------------------------------------|---------------------------------------|
| Acute, Chronic or Acute on Chronic | Unspecified (Please Specify)          |
| Systolic, Diastolic or Combined    | Other cardiomyopathy (please specify) |

Is the condition secondary to another disease process (please specify: hypertension, valvular disease, rheumatic heart disease, endocarditis, pericarditis, myocarditis, cardiac or other surgery, other.)

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

---

**NW-CDI\_ CVA**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please update documentation if all acute deficits are clinically significant and can be further specified as:

- |  |              |
|--|--------------|
| Hemiplegia   | Monoplegia   |
| Other sequelae (aphasia, apraxia, ataxia, dysphagia, vertigo, etc) | Undetermined |

If applicable, please document if the condition is **due to hemorrhage** (please specify: subarachnoid, intracerebral, intracranial, subdural, laterality) or **due to causes other than hemorrhage** (please specify: thrombosis, embolism, unspecified occlusion or stenosis).

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

---

**NW-CDI\_ Delirium**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

If applicable, please clarify any known or suspected underlying cause of Altered Mental Status. Based on your clinical judgment, please document if the clinical interpretation indicates a more clinically significant diagnosis, which may include one of the following:

Delirium (please specify if alcohol withdrawal, intoxication, drug induced, drug withdrawal, or other cause)

Encephalopathy (please specify: toxic, metabolic, septic, uremic, hepatic, anoxic, or other)

Other (please specify) Not Applicable

Please document the appropriate diagnosis, include treatment plan and update the Problem List. Thank you,

---

**NW-CDI\_ DM**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

DM (not yet dx)

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

DM (please specify: type 1, type 2, drug/chemical induced, with or without coma)

If applicable, please document if the condition is linked to another disease process (please specify: hyperosmolarity, hypoglycemia, ketoacidosis, renal, neurological, ophthalmic, oral, skin, circulatory, arthropathy)

This "DM" CDI query is leading since it's introducing the single DM diagnosis which has "not yet dx". The query label already lists the diagnosis of "DM" and no options are available for other conditions or options for "unknown", "unspecified", "clinically undetermined" or "other". This is not providing a reasonable option which as mentioned in the AHIMA Practice Brief.

Please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

---

#### NW-CDI\_ DM Comp

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

If applicable, please document if the condition is linked to another disease process. Please specify:

Neuropathy, Chronic Kidney Disease, Nephropathy, Retinopathy, Cataract, Dyslipidemia, Peripheral Vascular Disease, Diabetic Ulcer, Skin, Oral, Other, or No Chronic Complications.)

Please document the appropriate diagnosis, include treatment plan and update the Problem List. Thank you,

---

#### NW-CDI\_ DM Dyslipidemia

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

Clinical Indicators: (Triglycerides > 150 and/or HDL < 35 and dx Diabetes)

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Diabetic Dyslipidemia

Other (please specify)

No clinical significance

A “**cause and effect**” relationship between diagnoses may not be assumed and coded unless documented by the physician. Please document (underlying condition/manifestation) if any relationship exists between these conditions and the patient's diabetes.

---

Please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

---

**NW-CDI\_MI**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

**STEMI** (please specify: **anterior wall**- left main coronary artery, left anterior descending artery, other coronary artery of anterior wall, **inferior wall**- right coronary artery, other coronary artery of inferior wall, **other**- left circumflex coronary artery, other specified.)

**Non-ST elevation MI (NSTEMI)**

If applicable, please document any recent acute MIs within 28 days of admission and whether or not the current MI has occurred within 28 days of a previous MI. Additionally, please document if the patient has a history of an MI (older than 28 days), and any associated diagnoses/conditions.

Please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

---

**NW-CDI\_PCM**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Malnutrition Mild

Malnutrition Moderate

There are no additional options listed for this malnutrition query such as "clinically undetermined" or "unknown" (SAME AS OTHER QUERIES IN THIS DOCUMENT).

Malnutrition Severe

Other (please specify)

In addition, please document any associated diagnoses such as, due to acute disease, if applicable.

Please provide the appropriate diagnosis, include treatment plan and **update the Problem List**. Thank You,

---

#### NW-CDI\_PNA

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Include Type: aspiration, community-acquired, health care associated, ventilator associated, or other

If applicable, please clarify any **known or suspected** underlying causative organism

**Other Pneumonia** (please specify)

**Unknown / Not Applicable**

Please document if the condition is linked to another disease process (please specify: respiratory failure, sepsis, underlying lung disease, other.)

Please provide the appropriate diagnosis, include treatment plan and **update the Problem List**. Thank You,

---

#### NW-CDI\_RENAL

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

**Acute Renal Failure (ARF)** (if applicable, please specify: due to acute tubular necrosis (ATN), acute cortical necrosis, or other as specified)

**Acute on Chronic Renal Failure**

**Chronic Renal Failure with Stage**

**Other** (please specify)

In addition, please document any associated diagnoses/conditions if applicable.

Please provide the appropriate diagnosis, include treatment plan and **update the Problem List.**

Thank You,

---

**NW-CDI\_RESP**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Acute Respiratory Failure

Chronic Respiratory failure

Acute on chronic respiratory failure

If respiratory failure, Please specify hypoxic, hypercapnic, or mixed

Other (please specify)

Not Clinically Relevant

In addition, please document any associated diagnoses/conditions if applicable.

Please provide the appropriate diagnosis, include treatment plan and **update the Problem List.** Thank You,

---

**NW-CDI\_SEPSIS**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

**Sepsis without organ dysfunction**

**Severe Sepsis with organ dysfunction**

**Septic Shock**

(please specify: organ dysfunction- respiratory failure, encephalopathy, acute kidney failure, other)



(please specify: site, stage, with gangrene  
if applicable and document if ulcer is present on admit)

**Postoperative Complication**

**Chronic Ulcer**

**Other / Unable to Determine**

(except pressure ulcer) with site documented

If applicable, please document the type, such as: arteriosclerotic, decubitus, diabetic, gangrenous.

Please provide the appropriate diagnosis, include treatment plan and update the Problem List.

Thank You,

---

**NW-CDI\_Urosepsis**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

Urosepsis is a nonspecific entity for coding purposes. Please specify any suspected or known associated illness and/or etiology of the Urosepsis.

**Sepsis due to Urinary Tract Infection**

**Severe Sepsis due to Urinary Tract Infection**

**Urinary tract infection**

**Other condition** (please specify)

In addition, please document if the condition is present of admission or clinically undetermined.

A “**cause and effect**” relationship between diagnoses may not be assumed and coded unless documented by the physician. If applicable, please document (underlying condition/manifestation) if any relationship exists between these conditions, such as: sepsis and UTI.

Please provide the appropriate diagnosis, include treatment plan and update the Problem List.

Thank You,

---

**NW-CDI\_AA**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

Aortic Atherosclerosis

Atherosclerosis of Valve (please specify valve)

Other Atherosclerosis

Insignificant / Undetermined

If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List. Thank You,**

---

### NW-CDI\_BMI

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

- Severe Obesity, defined as BMI equal to or greater than 40 with or without co-morbidities
- Severe Obesity, defined as BMI 35-39.9 with 1 or more co-morbidity
- Obesity, BMI 30-35
- Comorbidity is at least in-part "due to" severe obesity

Please document any applicable comorbidities which may include: coronary artery disease, diabetes, degenerative joint disease, hypertension, hyperlipidemia, obstructive sleep apnea

If applicable, please document the appropriate diagnosis, include treatment plan, and **update the Problem List. Thank you**

---

### NW-CDI\_NICU-FGR

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Gestational Age: As specified by attending provider for newborn.

Birthweight: Below the 10th percentile for babies of the same gestational age.  
Length & head circumference may be variable.

Calculators: Web based size for gestational age calculator: <http://peditools.org/fenton2013>

Based on your independent clinical judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

- Fetal Growth Retardation
- Light for Dates with signs of Fetal Malnutrition
- Light for Dates without mention of
- Fetal Malnutrition without mention of

Fetal Malnutrition  
- Other

Light for Dates  
- Not able to be determined

Please specify weight with diagnosis. If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List**. Thank You,

---

#### NW-CDI\_NICU-Blood Group

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

Hemolytic disease due to Rh isoimmunization

Hemolytic disease due to ABO isoimmunization

Hemolytic disease due to other and unspecified isoimmunization

Other (Please Specify)

If applicable, please provide the appropriate diagnosis, include treatment plan and **update the Problem List**. Thank you,

---

#### NW-CDI\_NICU-DIC

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

Neonatal Coagulopathy

Disseminated Intravascular Coagulation

Neonatal Thrombocytopenia

Other (please specify) / Unknown

If applicable, please provide the appropriate diagnosis, include treatment plan and **update the Problem List.**

Thank you,

---

### NW-CDI\_NICU-Aspiration

**Dear Doctor,**

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

#### **Applicable definitions:**

- a) **Meconium:** Meconium stained amniotic fluid and respiratory distress (tachypnea, grunting, nasal flaring, or retraction) within 1h of birth and abnormal CXR (coarse, irregular air space densities, areas of diminished aeration and consolidation alternating with areas of hyperinflation) and absence of culture proven sepsis/pneumonia or RDS.
- b) **Amniotic fluid, blood, or stomach contents:** O2 requirement within 1h of birth and pulmonary infiltrates on CXR and no meconium in the amniotic fluid and no RDS, culture proven sepsis/pneumonia, or cardiac disease

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

- "x" aspiration WITH respiratory distress
- "x" aspiration with pneumonia
- "x" Aspiration WITHOUT respiratory distress
- Other, please specify

If applicable, please provide the appropriate diagnosis, include treatment plan and **update the Problem List.**

Thank you,

---

**NW-CDI\_NICU-NEC**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

**NEC: 777.5**

**One or more clinical signs:**

- 1. Bilious or bloody emesis or aspirates;
- 2. Abd distention,
- 3. Blood in the stool.

**One or more radiographic findings:**

- 1. Pneumatosis intestinalis
- 2. Hepato-biliary gas
- 3. Pneumoperitoneum

**Perinatal Intestinal Perforation: 777.6**

Pneumoperitoneum (or focal perforation confirmed at laparoscopy) **not** associated with pneumatosis intestinalis, hepato-biliary gas, grossly bloody stools, or significant clinical shock and DIC.

**\* In most cases it must be NEC or Perforation, not both.**

Based on your independent clinical judgment, please update documentation if the above indicators are clinically significant and can be further specified as:

- NEC with pneumatosis, without perforation
- NEC with perforation
- NEC with pneumatosis and perforation
- Perinatal Intestinal Perforation
- Other / Not able to be determined

- 777.52 Stage 2
- 777.53 Stage 3
- 777.53 Stage 3
- 777.6

Question? Why does this physician query include ICD codes with actual code descriptions?

If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List.**

Thank You,

---

**NW-CDI\_NICU-RDS**

**Dear Doctor,**

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

a) PaO2 <50 in room air, central cyanosis in room air, a requirement for supplemental oxygen to maintain PaO2 >50, or a requirement for supplemental oxygen to maintain a pulse oximeter saturation over 85% within the first 24hrs of life.

b) CXR consistent with RDS within the first 24 hrs of life.

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

Please specify:

Respiratory Distress Syndrome

Other, please specify

Acute hypoxic respiratory failure, specify cause if known

Undetermined

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List.

Thank You,

---

**NW-CDI\_NICU-PNA**

**Dear Doctor,**

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

**Presumed pneumonia:** CXR and symptoms indicate pneumonia, antibiotics for  $\geq$  96h, no pathogen in ETT or blood cultures.

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

Please specify an organism if known:

- Presumed Pneumonia
- (please specify: suspected bacterial or viral)
- Health-care associated pneumonia
- Ventilator-associated Pneumonia
- Aspiration Pneumonia
- Undetermined

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List.

Thank You,

---

### NW-CDI\_NICU-CRD

Dear Doctor,

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

a) O2 requirement due to primary pulmonary disease at 36 wks (35+4to36+3) adjusted postmenstrual age in an infant with a **birthweight <1500 grams**. If the infant is alive but not in the PSVMC NICU at 36 weeks postmenstrual age then determine whether the infant is receiving oxygen therapy at the transfer hospital or at home.

b) Infants with **birthweights >1500 grams** and prolonged O2 needs (incl. home O2) **should be classified under their primary lung problem, e.g., MAS, CDH, NOT Chronic Lung Disease**

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

Please specify:

- Bronchopulmonary dysplasia (aka Chronic respiratory disease arising in the perinatal period)
- Respiratory Distress Syndrome
- Other, please specify
- Undetermined

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List. Thank You,

---

### NW-CDI\_NICU-SIRS

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient. \_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

- SIRS, noninfectious, without organ dysfunction
- SIRS, noninfectious, with organ dysfunction (if applicable, please specify the associated organ dysfunction)
- Other (please specify)
  - SIRS: at least 3 of the following:
    - Fever (temperature  $>38.5^{\circ}\text{C}$ )
    - Hypothermia (core temperature  $<36^{\circ}\text{C}$ )
    - Heart rate  $>180$  bpm
    - Tachypnea:  $>60$  breaths/minute
    - Lethargy
    - Significant edema or positive fluid balance ( $>20$  ml/kg over 24 h)
    - Hyperglycemia (plasma glucose  $>180$  mg/dL)
    - Apnea  $>$  usual baseline
- No Clinical significance

If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List. Thank you,**

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### NW-CDI\_NICU-SEPSIS

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

- SIRS, non-infectious
- Sepsis without organ dysfunction.
- Severe Sepsis with organ dysfunction. Please specify the associated organ dysfunction and organism, if known.
- Septic Shock
- Septicemia
- Other (please specify), or no clinical significance.

If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List. Thank you,**

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**NW-CDI\_NICU ARF**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

- |                           |                          |
|---------------------------|--------------------------|
| Acute Renal Failure (ARF) | Other (please specify)   |
| Acute Kidney Injury (AKI) | No Clinical Significance |

If applicable, please provide the appropriate diagnosis, include treatment plan, and **update the Problem List. Thank you,**

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**NW-CDI\_General**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified:

\_\_\_\_\_  
\_\_\_\_\_  
Not Applicable / No Clinical Significance

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List. Thank you,

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**NW\_CDI- CEREBRAL EDEMA**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Brain / Cerebral Edema	Hydrocephalus – Specify Non-Obstructive or Obstructive
Brain Compression	Other – Specify
Unspecified	Unknown

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank You,

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**NW\_CDI-NEUTROPENIA**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified as:

Drug-Induced Neutropenia	Neutropenia Due to Infection
Aplastic Anemia	Leukemia
Unspecified	Other - Specify

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank you,

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**NW\_CDI-PANCYTOPENIA**

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

Based on your independent professional judgment, please document in your progress note or discharge summary if these clinical indicators can be further specified as:

Anti-Neoplastic Chemotherapy Induced Pancytopenia	Other Drug-Induced Pancytopenia
Aplastic Anemia	Other Pancytopenia
Clinically Insignificant	Unknown

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List. Thank you,

NW\_CDI-ANEURYSM

---

Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient. Based on your clinical judgment, can you further specify in your progress note a diagnosis to more accurately assign the correct diagnosis code:

Site (Please Specify):    Abdominal        Thoracic        Thoracoabdominal        Other  
Type (Please Specify):    With Rupture                    or                    Without Mention of Rupture

If applicable, please provide the appropriate diagnosis, include treatment plan and update the Problem List. Thank you,

NW\_CDI-PVD

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Dear Dr. \_\_\_\_\_

A review of the patient record found that documentation clarification is necessary to meet medical necessity, accuracy of coding and to reflect the severity of illness and risk of mortality for your patient.

\_\_\_\_\_ (clinical indicator) \_\_\_\_\_ was documented in \_\_\_\_\_ dated \_\_\_\_\_

Based on your independent professional judgment, please clarify if a clinically significant diagnosis is related to the above clinical indicator:

Arteriosclerosis peripheral vascular disease (please specify: with rest pain, claudication, gangrene, ulcers) if applicable.

Arteriosclerosis of by-pass graft (please specify: autologous vein, non-autologous vein of biological by-pass graft) if applicable.

Chronic total occlusion of artery of extremities

Polyneuropathy

Arterial embolism and thrombosis

Unknown / Not Applicable

Is the condition secondary to another disease process: Diabetes, CHF, Congenital Defects, Arrhythmia?

If applicable, please provide the appropriate diagnosis, include treatment plan, and update the Problem List. Thank you,

# **EXHIBIT 32**

Clinical Documentation Integrity Program TIPS For Provider Prepared by KP Regional CDI Team

<p><b>Clinical Diagnoses &amp; KPHC Search Words “Synonyms”</b></p>	<p>•Document diagnoses in <u>final progress note and/or discharge summary</u>. For example, “Protein Calorie Malnutrition, Severe: followed by RD.”                  •Document diagnoses that you are actively treating or are affecting the patient or patient care this hospitalization.                  •Rule-outs count in the Hospital: Diagnoses that are DOCUMENTED IN THE DISCHARGE SUMMARY as “Possible” “Probable” “Likely” “Suspected” “?” or “R/O” are ACCEPTABLE.</p>	
<p><b>SKIN ULCER / GANGRENE ULCER / CHRONIC ULCER</b>                  “ulcer p” “gang” “ulcer c”</p>	<p><b>Possible Clinical Indicators:</b>                  — Braden score of ≤ 18 — WOC Consult                  — Bedbound, Wheelchair or SNF patients — Order for wound care                  — Nutritionally or immunocompromised patients — Nursing notes                  — Current or previous diagnosis of PCM</p>	<p><b>MD Documentation Tips:</b>                  •Document whether ulcers are <b>PRESENT ON ADMISSION</b> or community acquired                  •Document <b>TYPE</b> and <b>SITE</b> of all ulcers (pressure, decubitus, etc), <b>Stage</b> if possible.                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. DM, atherosclerosis, trauma, PCM)</p>
<p><b>PNEUMONIA / LUNG INFECTION</b>                  “pneumon”</p>	<p><b>Possible Clinical Indicators:</b>                  •Abnormal X-ray w/ indication of infection/infiltrate                  •Positive sputum culture                  •Organism-specific antibiotic                  •Evidence of H/O aspiration, dysphagia</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>TYPE</b> of pneumonia: aspiration, bacterial, viral, fungal                  •Document the <b>CAUSATIVE</b> or <b>SUSPECTED ORGANISM</b> (ie: psuedomonas, myoplasma, etc)                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. hypoxia, respfailure, septicemia, sepsis, etc.)                  •“Infiltrate” ≠ “PNA”                  •“Bacterial PNA ≠HCC”  <i>Example: Empirically treating for suspected gram-negative PNA</i></p>
<p><b>RENAL FAILURE</b>                  “acute renal f” “ckd”</p>	<p><b>Clinical Indicators:</b>  <b>ARF: Acute rise in Creatinine in appropriate clinical context OR R.I.F.L.E. Spectrum:</b>                  •<b>Risk:</b> Inc Cr by 1.5x <u>or</u> Dec GFR &gt; 25% <u>or</u> UO &lt;0.5ml/kg/h x 6hr;                  •<b>Injury:</b> Inc Cr by 2x <u>or</u> Dec GFR &gt; 50% <u>or</u> UO &lt;0.5ml/kg/h x 12h;                  •<b>Failure:</b> Inc Cr by 3x <u>or</u> Dec GFR &gt; 75% <u>or</u> UO &lt;3ml/kg/h x 24h <u>or</u> UO = 0 x 12h <u>or</u> Cr ≥ 4 with an acute rise &gt; 0.5 mg/dl  <b>CRF or CKD: CKD1:</b> Kidney damage - Persistent proteinuria, structural kidney disease (cyst), nephritic, asymptomatic UA abnormal, or other radiological abnormalities with a normal GFR&gt;90  <b>CKD 2:</b> GFR 60-89 and above CKD 1 structural findings, retinopathy  <b>CKD 3:</b> GFR 30-59 <b>CKD 5:</b> GFR &lt;15, patient is not on dialysis  <b>CKD 4:</b> GFR 15-29 <b>ESRD:</b> GFR &lt;15, patient is on RRT: HD or PD</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>ACUTE, CHRONIC</b> or <b>ACUTE ON CHRONIC</b>                  •Consider <b>ARF / AKI</b> using <b>RIFLE</b> criteria                  •Document <b>CKD STAGING 1 -5</b> using <b>GFR scale</b>                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. DM, HTN, PCKD, transplant complication)                  •“Nephropathy” ≠ “CKD”                  •“Acute Renal insufficiency” ≠ “Acute Renal Failure”                  •“Azotemia” or “Uremia” ≠ “Renal Failure”                  •“Pre-Renal Renal Failure” ≠ “Renal Failure”</p>
<p><b>PVD/PAD</b>                  “peri vas d” “pvd”</p>	<p><b>Possible Clinical Indicators / Symptoms:</b>                  •Ulcers, venous stasis, venous insufficiency, surgical H/O bypass                  •Ankle-Brachial index (ABI &lt; 0.9)                  •May include rest pain after recumbence, numbness, tingling or weakness in legs</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>DIAGNOSIS</b> of <b>PVD</b> (excludes carotid, basilar and vertebral art stenosis)                  •Document the <b>PRESENCE</b> and <b>SITE</b> of any <b>DVT</b> or other <b>THROMBOSIS</b>                  •Document <b>DIAGNOSIS</b> of <b>Aortic Atherosclerosis</b> or <b>Aneurysm</b> from imaging                  •“Venous insufficiency” ≠ “PVD”</p>
<p><b>CANCER</b>                  “breast ca,” “prostate”, “colon ca”                  “metast” “hx ca”</p>	<p><b>Possible Clinical Indicators:</b>                  •<b>Primary Sites &amp; any Invasive / Metastatic Sites</b> shown on imaging, biopsy, lab, path report                  •Active cancer is supported by tests, meds, treatments, palliative, &amp;/OR hospice care.</p>	<p><b>MD Documentation Tips:</b>                  •Document whether cancer is <b>ACTIVE</b> vs. “<b>HISTORY OF</b>”                  •Document <b>H/O Cancer</b> by “<b>NED</b>”: <b>No Evidence of Disease.</b>                  •Document the <b>PRIMARY SITE</b>                  •Document the <b>METASTATIC SITE</b>                  •Document all <b>RELATED CONDITIONS</b> (i.e. path fractures, PCM or cachexia, decubiti, major depression)</p>
<p><b>HEMIPLEGIA / HEMIPARESIS / STROKE</b>                  “late effect” “CVA”</p>	<p><b>Clinical Indicators:</b>                  •<b>LATE / RESIDUAL EFFECTS</b> of CVA can include:                  — <b>Hemiplegia OR Hemiparesis</b> (Acute or Late Effect <b>STROKE</b>)                  — Evidence of unilateral weakness or hemiplegia (PT notes)</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>TYPE</b> of stroke (ischemic, hemorrhagic, etc)                  •Document whether <b>OLD</b> vs. <b>NEW</b>                  •Document all <b>LATE</b> or <b>RESIDUAL CONDITIONS</b>                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. coma, brain compression, cerebral edema, hemiparesis / hemiplegia, etc.)                  •“Weakness” ≠ “Hemiplegia”</p>
<p><b>FRACTURES</b>                  “fra” “after”</p>	<p><b>Possible Clinical Indicators:</b>                  •“Acute Fracture” = Abnormal X-ray stating Fx site                  •“Chronic Fracture” = Compression Fx w/ symptoms &amp;/OR treatment                  •“Aftercare Fracture” = fractures already treated ≤ 90 days post Fx: No HCC                  •“H/O Fracture” = fracture is &gt;90 days old, resolved: No HCC</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>OPEN</b> vs. <b>CLOSED &amp; LOCATION</b> of all Fractures                  •Document whether Acute, Aftercare, Chronic Path Fx or H/O Fx                  •Document whether <b>EACH</b> fracture is <b>TRAUMATIC</b> vs. <b>PATHOLOGIC</b>                  •Document any/all <b>INTRACRANIAL INJURIES</b>                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. CA, osteoporosis, complications of Fx)</p>
<p><b>COMA / BRAIN COMPRESSION</b>                  “coma”</p>	<p><b>Clinical Indicators:</b>                  •Document “<b>COMA</b>” when pt. has:                  —Glasgow coma scale of ≤ 8 <b>OR</b> NIHSS score of 3 on question 1a (re: LOC)                  —<b>No</b> purposeful movement                  —is comatose                  —demonstrates only reflex responses to stimuli (i.e. pain)                  —has transient unresponsiveness (based on clinical judgment)                  •Document “<b>BRAIN COMPRESSION</b>” when pt has:                  — midline shift,                  — cerebral edema                  — mass effect                  — obstructive hydrocephalus</p>	<p><b>MD Documentation Tips:</b>                  •If the “<b>COMA</b>” is resolved during the course of treatment, document “<b>COMA RESOLVED</b>” (based on clinical judgment, no time duration associated with ‘coma’ definition)                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. CVA, DM, respiratory failure)                  •No time duration associated with “Coma” definition.                  •A description of “comatose”, “stupor” “unresponsive” “obtunded” ≠ Dx of “coma”</p>

<p><b>SEPSIS / SEPTICEMIA</b> "sepsis"</p>	<p><b>Clinical Indicators:</b>  <b>SIRS:</b> Any <b>TWO</b> of the following:                  - WBC &gt; 12K <b>OR</b> &lt; 4K                  - T &gt; 38 (100.4) <b>OR</b> &lt; 36 (96.8)                  - Pulse or HR &gt; 90                  - RR &gt; 20                  - Bands &gt; 10%                  - ALOC  <b>Sepsis:</b>                  •Any <b>TWO</b> of the above <b>SIRS</b> Indicators <b>AND</b>                  •A Diagnosis of <b>related current infection</b></p> <p><b>Bacteremia:</b> Positive blood culture (w/out fever)-No HCC  <b>Septicemia:</b> Bacteremia <b>AND</b> fever &gt; 38 (100.4)  <b>Severe Sepsis:</b>                  •Documented <b>Sepsis AND</b>                  • <b>Acute organ dysfunction OR</b>                  • <b>Lactate &gt;2</b> (Indicator for Severe Sepsis, not SIRS)  <b>Septic Shock</b>                  •Documented <b>Sepsis or Severe Sepsis AND Hypotension</b></p>	<p><b>MD Documentation Tips:</b>                  •Document <b>APPROPRIATE DIAGNOSIS</b> (Septicemia, SIRS, Sepsis, Severe Sepsis, Septic Shock)                  •NOTE: Sepsis/SIRS diagnosis does not require a Positive Blood Cx.                  •Document <b>INDICATORS</b> for Diagnosis                  •Document <b>UNDERLYING INFECTION</b>, (known or suspected)                  •Document <b>UNDERLYING NON-INFECTIOUS CONDITION</b>, (known or suspected, i.e. pancreatitis, cholecystitis, burn, trauma, etc.)                  •"Urosepsis" ≠ "Sepsis"; "Bacteremia" ≠ "Septicemia"                  •"Septicemia" = "Sepsis"                  Example: <b>SIRS or Sepsis due to PNA or other infectious Process; SIRS due to Acute Pancreatitis, or other Non-infectious Process</b></p>
<p><b>DIABETES W/ MANIFESTATIONS</b> "dm" "dm ckd" "dm 2"</p>	<p><b>Clinical Indicators:</b>                  •<b>Diabetic Renal Manifestation</b>                  —CKD, Nephropathy, renal insufficiency, proteinuria, microalbuminuria or abnormal GFR, high BUN or CR                  •<b>Diabetic Peripheral Circulatory Manifestation</b>                  —PVD, peripheral venous insufficiency or venous stasis                  •<b>Diabetic Neurological Manifestation</b>                  —Neuropathy or peripheral neuropathy</p>	<p><b>MD Documentation Tips:</b>                  •Document and <b>LINK ALL</b> other <b>DM ASSOCIATED CONDITIONS:</b>                  - DM w/ DM PVD or CKD                  - DM w/ DM NEUROPATHY                  - DM w/ DYSLIPIDEMIA (low HDL&lt;40 and high Tg&gt;200; WNL on rx)                  - DM w/ ERECTILE DYSFUNCTION                  •"Nephropathy" ≠ "CKD"</p>
<p><b>PCM / CACHEXIA / MALNUTRITION</b> "pcm" "mal" "cac"</p>	<p><b>Clinical Indicators (Two (2) or more required):</b>                  —Either Albumin ≤ 3.0 g/dl <b>OR</b> Pre-albumin ≤ 12 mg/dl                  —Either Pressure ulcer ≥ Stage 2 <b>OR</b> any non-healing wound                  —Either BMI ≤18 <b>OR</b> Patient's current weight is &lt; 90% of ideal body weight                  —<b>Both</b> &gt;10% weight loss of usual body weight <b>AND</b> H/O poor oral intake                   Note: Labwork is a clinical indicator but it is NOT required to diagnose</p>	<p><b>MD Documentation Tips:</b>                  •Read and Be Guided by RD Note                  •<b>Severe PCM:</b> requires 3 criteria.                  •Consider PCM in pts w/ CA, decubiti, on supplements &amp;/or TPN                  •"Cachexia" = PCM HCC                  •"Cachectic" ≠ "Cachexia"; Failure to Thrive ≠ Malnutrition</p>
<p><b>ARTIFICIAL OPENING</b> Feedings/Ostomies "osto"</p>	<p><b>Possible Clinical Indicators:</b>                  •Consider patients with                  - Enteral feedings – look for corresponding ancillary documentation w/out MD documentation                  - WOC nurse care for Ostomy                  - Surgical history of –Ostomy, w/o history of take-down</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>all artificial openings</b> for feeding or elimination                  •Does <b>NOT</b> include Tracheostomy                  •Document all <b>COMPLICATIONS</b>                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. PCM or cachexia, CA)</p>
<p><b>HYPOXIA / RESPIRATORY FAILURE &amp; SHOCK</b>  "chronic resp fail" "ARF" "hypox"</p>	<p><b>Clinical Indicators:</b>                  •<b>Hypoxia</b>                  —Hypoxia is a diagnosis captured based on MDs clinical assessment                  —Consider capturing "Hypoxia" if SaO2 ≤88%                  •<b>Chronic Respiratory Failure:</b>                  —PaO2 &lt; 60 mm Hg with or w/o arterial partial pressure of PaCO2 &gt; 50mm Hg <b>OR</b>                  —SaO2 ≤88% with or w/o arterial partial pressure of PaCO2 &gt;50mm Hg while breathing air at sea level for &gt;3mo.                  —Consider capturing "Chronic Resp Failure" when pt managed w/home O2.                  •<b>Acute Respiratory Failure:</b>                  —Consider capturing "Acute Resp Failure" if pt on mechanical ventilation, bipap, cpap, increased work of breathing, etc.                  •<b>Shock:</b>                  —Consider if treated w/ fluid boluses, transfusion and/or pressors to maintain hemodynamic stability</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>ACUTE, CHRONIC, or ACUTE ON CHRONIC</b>                  •Document <b>"HYPOXIA"</b> or <b>"HYPOXEMIA"</b> in appropriate patients                  •Document <b>RESPIRATORY DISTRESS</b> as <b>ACUTE</b> vs. <b>CHRONIC</b>                  •Document <b>CAUSE of shock</b> (i.e. hypovolemic, septic, cardiogenic, etc.)                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. sepsis, coma, acute lung edema, V Fib, V Flutter)                  •"O2 Dependent" ≠ "Chronic Respiratory Failure"                  •"Hypoxemia" = "Hypoxia"                  •"Hypoxemic" or "Hypoxic" ≠ "Hypoxia"                  •"Hypoxia" = ARF HCC</p>
<p><b>HEART FAILURE</b> "heart fail"</p>	<p><b>Possible Clinical Indicators:</b>                  • Abnormal BNP                  • Abnormal X-ray with indication of pulmonary edema, pleural effusions                  • Low EF                  • Abnormal Systolic or Diastolic Function on ECHO                  • SOB / Peripheral edema / Anasarca / Treatment w/ diuretic</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>ACUTE, CHRONIC, or ACUTE ON CHRONIC</b>                  •Document whether <b>SYSTOLIC</b> or <b>DIASTOLIC FAILURE</b>                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. left heart failure, cardiomyopathy, pulmonary HTN, hypoxia, etc.)                  •"Diastolic Dysfunction" ≠ "Diastolic Failure"</p>
<p><b>ARRHYTHMIA</b> type in name of rhythm to locate</p>	<p><b>Possible Clinical Indicators:</b>                  •Abnormal EKG &amp; / or telemetry strip reading                  •Abnormal Stress Test                  •Abnormal Holter Monitor                  •NOTE: <b>Cannot capture HCC:</b> If pacemaker or EPS procedure made patient asymptomatic and MD is <u>not</u> actively treating</p>	<p><b>MD Documentation Tips:</b>                  •Document all <b>cardiac arrhythmias</b> such as PSVT, AFib, AFlutter                  •Document to <b>Confirm / Clarify EKG finding(s)</b></p>
<p><b>MI / ANGINA</b> "myocar"</p>	<p><b>Possible Clinical Indicators:</b>                  •Abnormal EKG &amp; / or telemetry strip reading  <b>Angina, Stable or Unstable:</b>                  —If pt is asymptomatic and there is ongoing treatment for condition <b>OR</b>                  —If pt has signs or symptoms even if managed by medication  <b>"Subsequent care for an MI" = occurred &lt;8 weeks ago</b> vs. <b>"Old MI" = occurred &gt; 8 weeks ago</b>                  •NOTE: <b>Cannot capture HCC:</b> If CABG, stent, <u>or</u> angioplasty made patient asymptomatic and MD is <u>not</u> actively treating</p>	<p><b>MD Documentation Tips:</b>                  •Document all <b>MI diagnoses with the treatment or monitoring plans</b>                  •Document whether <b>ACUTE</b> or <b>OLD MI</b> (specify date if old)                  •Document any <b>POST-MI SYNDROME</b>                  •Document all <b>CORONARY OCCLUSIONS w/o MI</b>                  •Document any <b>DEMAND ISCHEMIA</b>                  •Document <b>TYPE OF ANGINA</b> as unstable vs. stable                  •If patient is asymptomatic on meds, consider "stable angina on specific med"</p>
<p><b>TRAUMATIC AMPUTATION / S/P AMPUTATION</b> "amput"</p> <p>Rev. 3- 22-11</p>	<p><b>Possible Clinical Indicators:</b>                  •Wheelchair or Bedbound                  •WOC consult                  •PT notes                  •RD notes</p>	<p><b>MD Documentation Tips:</b>                  •Document <b>ALL</b> amputations                  •Document <b>SITE &amp; LEVEL</b> of Amputation                  •Document <b>MECHANISM</b> (i.e. surgical, traumatic, crush, etc)                  •Document all <b>UNDERLYING &amp; RELATED CONDITIONS</b> (i.e. PVD, DM, non-healing, infected, sepsis, gangrene)</p>

# **EXHIBIT 33**

# CDI Prioritization for Roll Out

July 2010

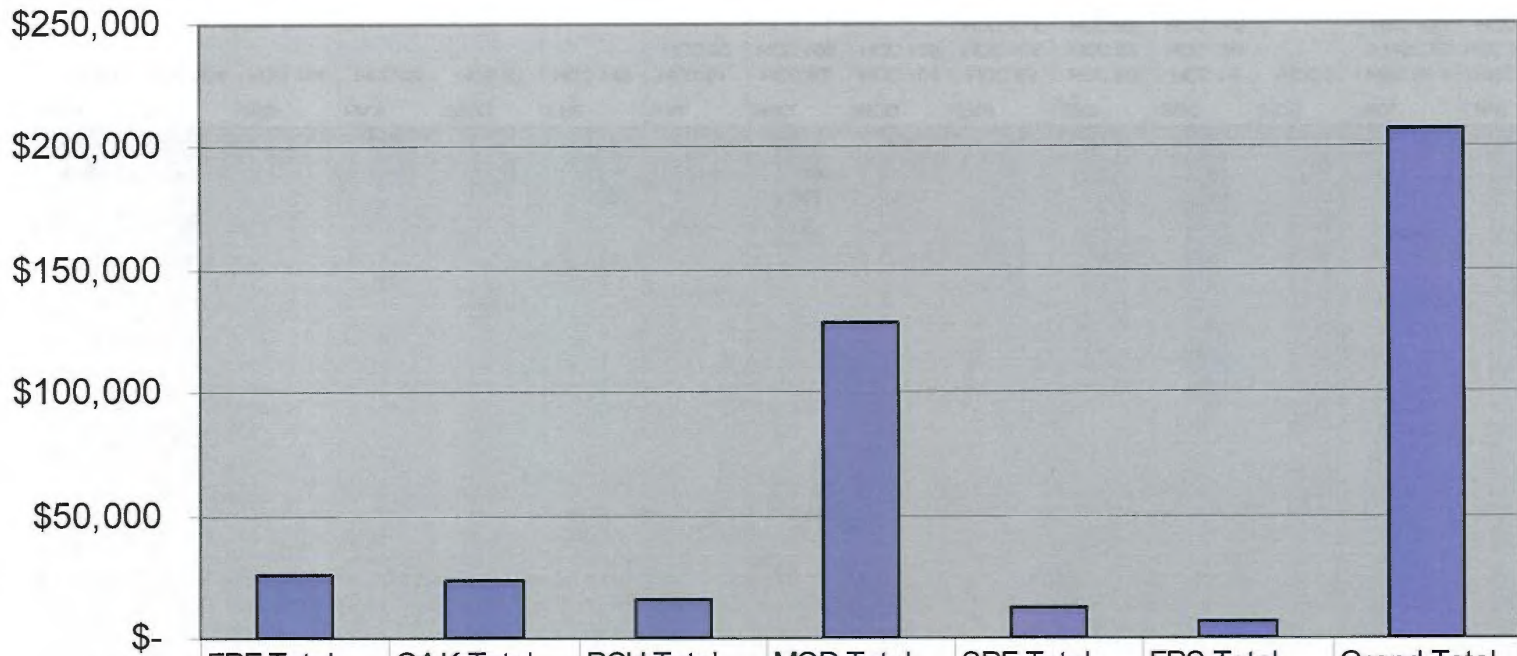
VH00362

REL0000570

# Criteria

- Internal Audit results
  - External Audit results
  - HCC Recapture
  - Staffing Candidates
- 
- Note: If one Med Ctr in a pair was identified with opportunity, then other Med Ctr was included in roll out.

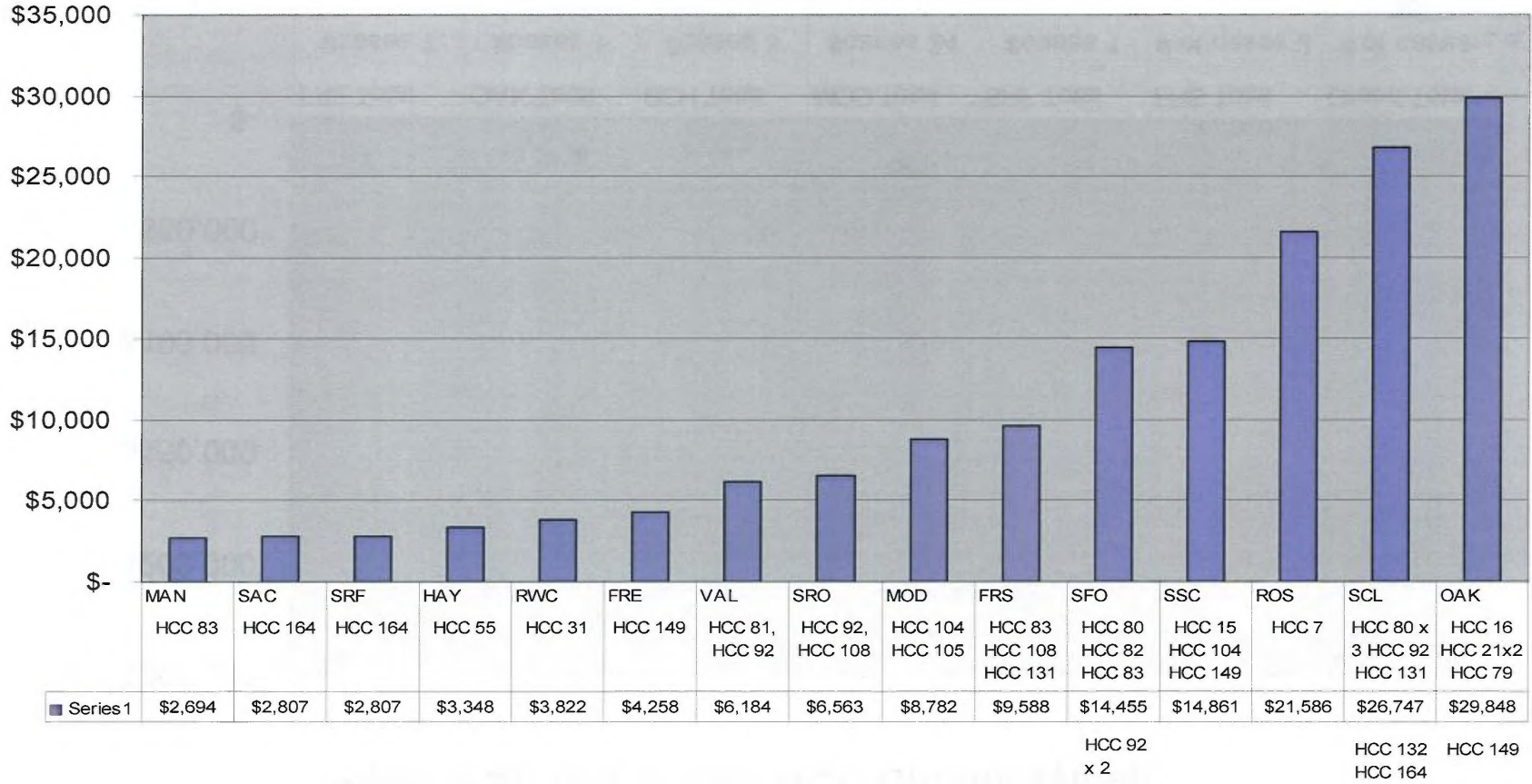
### Internal Audit Inpatient HCC UnderPayment



	FRE Total	OAK Total	RCH Total	MOD Total	SRF Total	FRS Total	Grand Total
	#cases 7	#cases 1	#cases 3	#cases 24	#cases 1	# of cases 2	# of cases 38
■ HCC UnderPayment	\$26,175	\$23,321	\$16,167	\$128,653	\$12,665	\$7,060	\$206,981.00

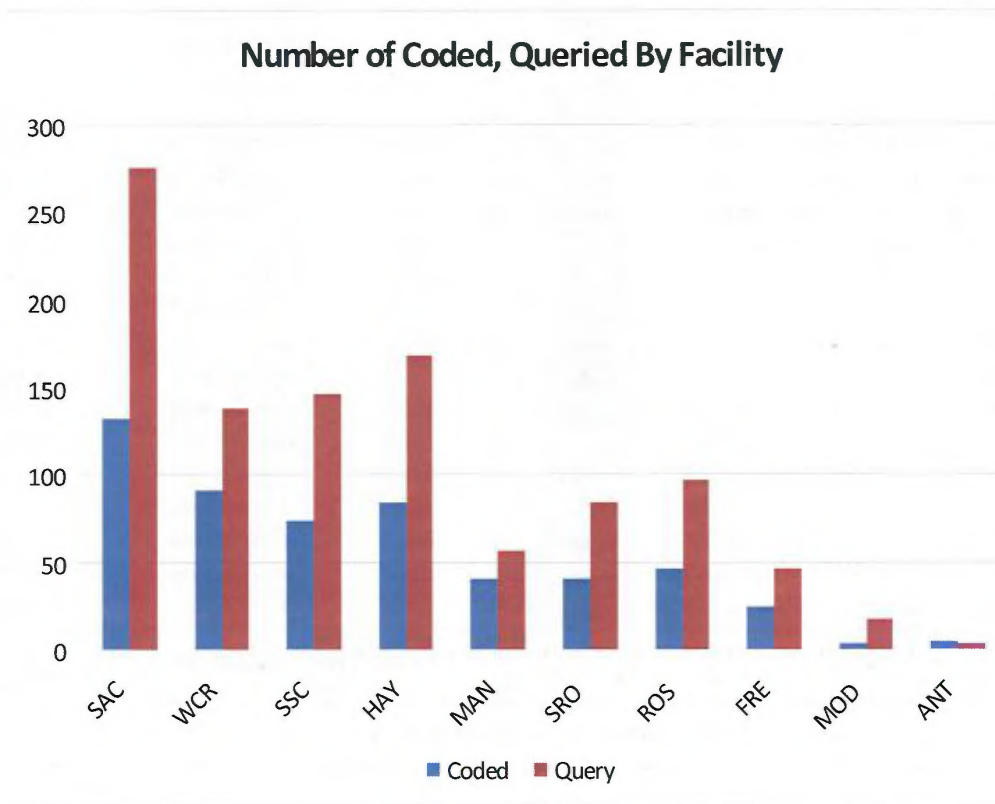
VH00364

External Audit Inpatient \$ HCC by facility



All 21 hospitals audited – these are only hospitals with findings.

# Facility Breakdown HCC Recapture 2008



\*Note variance may be due to when facilities went live on IP2. Review is only based on facilities with full EHR.

# Available Staffing

Clinical Documentation Integrity Program - Recruiting Tracking													
2													
3	Candidate First Name	Candidate Last Name	Not Interested	Email Address	Date Resume Rec'd	Position of Interest	Clinical or HIM	Credential/ Degree	Source	Relo FROM: City & State	Phone Screen DATE	Medical Center	
29	25	Janice	Bayol	Pending-med ctr		5/3/10	CDIC QA	HIM	RHIT,CCS,CPC,CPC-I	KP-not KP ee	Pacheco	5/12 @ 2	WCR
30	26	Donna	McIvor	Pending-med ctr		2/23/10	CDIC	Clinical	RN, MSN, BSN	KP - KFHP	San Jose	3/2 @ 2pm	SJO
31	27	Linda	Zwass	Pending-med ctr		12/1/09	CDIC	Clinical	RN, MS	KP	Milbrae	2/1 @ 2:30	RWC
32	28	Rhowena Defante	Arceo	Pending-med ctr		10/3/09	CDIC	Clinical	MD, CCS	KP	SCAL	2/12 @ 2pm	SRO
33	29	Nancy	Morales	Pending-med ctr		12/26/09	CDIC	Clinical	RN, BSN, CPC	KP - KFH	Fresno	1/18/10	SRO
34	30	Vicki	Polster	Pending-med ctr		1/4/10	CDIC	Clinical	RN, BSN	NHS	Auburn, CA	1/25 @ 3:30	ROS
35	31	Ugo	Nzeadibe	Pending-med ctr		1/8/10	CDIC	Clinical	RN, MSN	KP - KFH	Brentwood	1/19/10	ANT
36	32	Ann	Gubler	Pending-med ctr			CDIC	Clinical	RN	KP - KFH	Oakley	2/12 @ 4pm	ANT
37	33	Valerie	Goodwin	Pending-med ctr		2/16/10	CDIC	Clinical	RN	KP - KFH	Brentwood	3/2 @ 3	ANT
38	35	Gail	Worth	Pending-med ctr		2/11/10	CDIC QA	Clinical	RN,BSN,MPH	KP - KFH	Oakland	2/19 @ 4	WCR
39	36	Karyn (Denise)	Snipes	Pending-med ctr		1/26/10	CDIC	Clinical	RN, BSN,MPA	KP - KFH	Hayward	1/27 @ 4	HAY
40	37	Lateef	Ogunleye	Pending-med ctr		12/16/09	CDIC QA	Clinical	RN, BSN, MS	KP - KFH	Vacaville	3/1 @ 4	OAK
41	38	Joanna	Moore	Pending-med ctr		1/8/10	CDIC	Clinical	RN, MSN, CCM, CPHM	KP - KFH	Placerville	1/26 @ 3	SAC
42	39	Navdip	Gill	Pending-med ctr		1/8/10	CDIC	Clinical	RN	KP-not KP ee	Manteca	1/21/10	SAC
43	40	Deborah Ann	Wilkens	Pending-med ctr		1/12/2010	CDIC	Clinical	R.N., B.S.N.	KP-not KP ee	Stockton	2/1 @ 4	MOD
44	41	Becky	Mann	Pending-med ctr		6/1/10	CDIC	Clinical	RN	On Assign	Napa	6/11 @ 11	VAL
45	42	Kerry	Petersen	Pending-med ctr		6/9/10	CDIC	Clinical	RN BSN	Stern Assoc	Benecia	6/23 @ 11	VAL
46	43	Deborah	Sims	Pending - TPMG		3/8/10	CDIC QA	HIM	RHIT	KP-TPMG	Hayward	3/16 @ 2	
47	44	Chara	Perez	Pending - TPMG		5/18/10	CDIC	Clinical	RN	KP-TPMG	Turlock	6/3 @ 5:30	
48	45	Anita	Price	B candidate		12/15/09	CDIC	Clinical	RN, BSN, CCM	NHS	SAC	1/25 @ 4pm	ROS
49	46	Fraulein S.	Nelson	B candidate		12/16/09	CDIC	Clinical	RN, MSN	KP-not KP ee	Folsom,CA	2/1 @ 2	ROS
50	47	Ann Eliese	Wolff	B candidate		10/13/09	CDIC	Clinical	RN	KP - KFH	Brentwood	10/15/09	ANT
51	48	Ellen	Geohegan	B candidate		1/11/2010	CDIC	Clinical	RN, BS	KP	Santa Rosa	1/22/10	SRO
52	49	Geri	Tanimoto	B candidate		1/18/10	CDIC	Clinical	RN, MS	KP	SanLeandro	1/29 @ 4	OAK
53	50	Reshma	Sharma	B candidate		11/29/09	CDIC	Clinical	RN,MHA,BSN	KP	Modesto	12/18/09	MOD
54	51	Valerie	Toler	B candidate		1/8/10	CDIC	Clinical	RN, BA, LNC	KP	Hayward		HAY
55	52	Jane	Terman	B candidate		1/8/10	CDIC	Clinical	RN, CNOR, OHN	KP	OR		
56	53	Napoleon	Nazareno	B candidate		11/28/09	CDIC	Clinical	RN	KP	Hayward		

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# CDI Priority Sites

- Walnut Creek & Antioch
- Roseville with Sacramento
- San Jose & Santa Clara
- Oakland & Richmond

## Clinical Documentation Integrity Program Staffing Waterfall Template v2.5 (26-Jul-10)

NO DATA ENTRY EXCEPT IN GREEN-SHADED COLUMNS				
Medical Center Use drop down menu (Column B) ONLY		CDI Start Date (MM/DD/YY)	New Hires Must Start No Later Than:	CDI "Go Live" Complete
SSC	South Sacramento (SSC)	7-Dec-09	7-Nov-09	6-Jan-10
SSF	South San Francisco (SSF)	15-Sep-10	16-Aug-10	15-Oct-10
SAC	Sacramento (SAC)	10-Nov-10	11-Oct-10	10-Dec-10
ROS	Roseville (ROS)	10-Nov-10	11-Oct-10	10-Dec-10
WCR	Walnut Creek (WCR)	10-Nov-10	11-Oct-10	10-Dec-10
ANT	Antioch (ANT)	10-Nov-10	11-Oct-10	10-Dec-10
SJO	San Jose (SJO)	12-Jan-11	13-Dec-10	11-Feb-11
SCL	Santa Clara (SCL)	12-Jan-11	13-Dec-10	11-Feb-11
OAK	Oakland (OAK)	12-Jan-11	13-Dec-10	11-Feb-11
RCH	Richmond (RCH)	12-Jan-11	13-Dec-10	11-Feb-11
FRE	Fremont (FRE)	23-Feb-11	24-Jan-11	25-Mar-11
HAY	Hayward (HAY)	23-Feb-11	24-Jan-11	25-Mar-11
SRO	Santa Rosa (SRO)	23-Feb-11	24-Jan-11	25-Mar-11
SRF	San Rafael (SRF)	23-Feb-11	24-Jan-11	25-Mar-11
FRS	Fresno (FRS)	6-Apr-11	7-Mar-11	6-May-11
MAN	Manteca (MAN)	6-Apr-11	7-Mar-11	6-May-11
MOD	Modesto (MOD)	6-Apr-11	7-Mar-11	6-May-11
SFO	San Francisco (SFO)	18-May-11	18-Apr-11	17-Jun-11
RWC	Redwood City (RWC)	18-May-11	18-Apr-11	17-Jun-11
VAL	Vallejo (VAL)	13-Jul-11	13-Jun-11	12-Aug-11
VAC	Vacaville (VAC)	13-Jul-11	13-Jun-11	12-Aug-11

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