

Billing Analysis / CPT-ICD Review

Case: test-case-5-6143587d0932ce510d808ba396be34fb

Executive Health Card

TOTAL BILLED

\$27,960.00

COMPLIANCE RISK

HIGH

FRAUD PROBABILITY

100/100 (high)

QA STATUS

QA WARN — provisional

UNSUPPORTED

\$1,705.00

This score reflects documentation irregularities only. Composite 0–100 score from deterministic fraud/rule indicators — not a finding of fraud, intent, or liability

Authoritative Findings Digest

- QA status: warn (provisional — clean narrative refused)
- Fraud-indicator score: 100/100 (high) — This score reflects documentation irregularities only. Composite 0–100 score from deterministic fraud/rule indicators — not a finding of fraud, intent, or liability
- Missing ICD: 7 line(s) — e.g. 2024-02-08 CPT 97162; 2024-02-08 CPT 97110; 2023-12-15 CPT 99213
- Unsupported / contradicted CPT: 3 line(s); unsupported \$1,705.00 — e.g. CPT 99233 (DOS missing on billing extract); CPT 11042 (DOS missing on billing extract)
- Litigation leverage: HIGH compliance risk; Litigation Leverage — Total Unsupported Charges \$1,705.00 | Compliance Risk HIGH | Unbundling / Modifier-25 flags: 6 rows

33 CPT row(s) abstain on Timing vs So C — Timing vs standard-of-care not determined from available extracts (no published So C timing table loaded)

3 billing line(s) still lack DOS on the extract after chronology inference

Billing Overview

TOTAL BILLED
\$27,960.00
TOTAL ALLOWED
\$0.00
TOTAL PAID
\$0.00

CPT Code Timeline

Lists every billing line from the extract. Identical CPT/date/charge pairs can appear twice when OCR or source rows differ (e.g. blank vs named provider). Fraud Indicators flag *duplicate_line* only for the same date + CPT + provider triple — not every repeated timeline row.

Date	CPT	Description	Provider	Location	Charge	Units	Source
	11042	CPT 11042	—		\$1,120.00		row 9
	99233	CPT 99233	—		\$310.00		row 8
	99239	CPT 99239	—		\$275.00		row 10
2023-12-15	99213	Office/outpatient visit, established patient, low complexity	A. Nguyen, PA-C		\$185.00		row 30
2024-01-08	99213	Office/outpatient visit, established patient, low complexity	A. Nguyen, PA-C	CLINIC	\$185.00		row 31
2024-01-19	73030	CPT 73030	K. Patel, MD		\$210.00	1	row 26
2024-01-19	96372	CPT 96372	—		\$95.00		row 25

Date	CPT	Description	Provider	Location	Charge	Units	Source
2024-01-19	99285	CPT 99285	—	ED	\$1,240.00	1	row 24
2024-01-24	99204	CPT 99204	—		\$320.00	1	row 28
2024-02-05	73221	CPT 73221	L. Cho, MD		\$1,850.00	1	row 29
2024-02-08	97110	Therapeutic exercises	J. Ruiz, DPT		\$85.00		row 1
2024-02-08	97140	Manual therapy techniques	—		\$75.00	1	row 2
2024-02-08	97162	CPT 97162	J. Ruiz, DPT	CLINIC	\$165.00	1	row 0
2024-02-12	97110	Therapeutic exercises	J. Ruiz, DPT		\$170.00	2	row 3
2024-02-18	99213	Office/outpatient visit, established patient, low complexity	—	CLINIC	\$195.00		row 32
2024-02-22	97110	Therapeutic exercises	—		\$245.00	1	row 4
2024-03-01	99214	Office/outpatient visit, established patient, moderate complexity	—	CLINIC	\$240.00	1	row 5
2024-03-05	70450	CT head/brain without contrast	—	INPATIENT	\$980.00	1	row 6
2024-03-05	99223	CPT 99223	—	INPATIENT	\$485.00	1	row 7
2024-03-11	99243	CPT 99243	S. Bernstein, MD	ED	\$375.00	1	row 11
2024-03-15	95908	CPT 95908	—		\$890.00		row 33
2024-03-18	73721	MRI joint of lower extremity without contrast	—		\$1,650.00		row 34
2024-03-28	20610	Arthrocentesis, major joint	—	OFFICE	\$285.00	1	row 12
2024-03-28	99213	Office/outpatient visit, established patient, low complexity	—		\$165.00		row 13
2024-04-05	97110	Therapeutic exercises	J. Ruiz, DPT		\$170.00	2	row 15
2024-04-10	20610	Arthrocentesis, major joint	M. Harlan, MD		\$285.00		row 19
2024-04-10	62323	CPT 62323	M. Harlan, MD		\$800.00		row 21
2024-04-10	72148	MRI lumbar spine without contrast	M. Harlan, MD		\$1,200.00		row 20
2024-04-10	93000	Electrocardiogram, complete	M. Harlan, MD		\$85.00		row 22
2024-04-10	97010	Hot or cold packs	M. Harlan, MD	CLINIC	\$8,150.00	1	row 35
2024-04-10	97110	Therapeutic exercises	M. Harlan, MD	CLINIC	\$4,950.00	33	row 18
2024-04-10	99283	Emergency department visit, moderate severity	M. Harlan, MD		\$250.00		row 17
2024-04-10	99455	CPT 99455	M. Harlan, MD	CLINIC	\$275.00	1	row 16

ICD Diagnosis Mapping

Date	CPT	ICD	Support	Note
2024-02-08	97162	—	missing icd	No ICD linked to this CPT
2024-02-08	97110	—	missing icd	No ICD linked to this CPT
2024-02-08	97140	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-02-12	97110	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-02-22	97110	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-03-01	99214	M 25.512	supported	ICD is on the configured allowlist for this CPT
2024-03-05	70450	A 41.9	not supported	ICD is outside the configured allowlist for this CPT
2024-03-05	99223	A 41.9	unchecked	CPT has no allowlist entry; ICD presence recorded only
	99233	A 41.9	unchecked	CPT has no allowlist entry; ICD presence recorded only
	11042	A 41.9	unchecked	CPT has no allowlist entry; ICD presence recorded only
	99239	A 41.9	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-03-11	99243	G 56.02	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-03-28	20610	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-03-28	99213	R 51.9	supported	ICD is on the configured allowlist for this CPT
2024-04-05	97110	M 75.102	not supported	ICD is outside the configured allowlist for this CPT

Date	CPT	ICD	Support	Note
2024-04-10	99455	M 75.102	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-04-10	99283	S 33.5 XXA	supported	ICD is on the configured allowlist for this CPT
2024-04-10	97110	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-04-10	20610	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-04-10	72148	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-04-10	62323	M 75.102	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-04-10	93000	M 75.102	not supported	ICD is outside the configured allowlist for this CPT
2024-01-19	99285	M 25.512	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-01-19	96372	M 25.512	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-01-19	73030	M 25.512	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-01-24	99204	S 46.012A	unchecked	CPT has no allowlist entry; ICD presence recorded only
2024-02-05	73221	M 75.102	unchecked	CPT has no allowlist entry; ICD presence recorded only
2023-12-15	99213	—	missing icd	No ICD linked to this CPT
2024-01-08	99213	—	missing icd	No ICD linked to this CPT
2024-02-18	99213	—	missing icd	No ICD linked to this CPT
2024-03-15	95908	—	missing icd	No ICD linked to this CPT
2024-03-18	73721	—	missing icd	No ICD linked to this CPT
2024-04-10	97010	M 75.102	not supported	ICD is outside the configured allowlist for this CPT

Documentation Support Check

Grouped with facility/provider rollout; detail expandable below.

▼ Documentation support detail

Date	CPT	Status	Event ID	Evidence	Charge	Rationale
2024-02-08	97140	partial	2024-02-08_371c582c	...al RTC tear. Plan: 2×/week for 6 weeks. Manual therapy, progressive strengthening. HEP issued. Session Notes planned: • 02/08: Pain 8/...	\$75.00	Partial evidence [event_id: 02/08/2024_371c582c, date: 2024-02-08] (score 4); incomplete match for ICD
	99233	unsupported			\$310.00	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
	11042	unsupported			\$1,120.00	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
	99239	unsupported			\$275.00	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
2024-01-24	99204	partial	2024-01-24_4f543a45	ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Purpose: Ortho eval; MRI + PT ordered BATES-000007 FACILITY: Harlan Shoulder Clinic — Or	\$320.00	Partial evidence [event_id: 01/24/2024_4f543a45, date: 2024-01-24] (score 3); incomplete match for CPT/procedure, ICD

Charge Accuracy Review

Allowed/Variance show *Not on extract* when remittance (allowed amount) is absent. Flag joins line-level Fraud Indicators (duplicate line, unbundling, CPT/ICD issues) for that billing row.

Date	CPT	Billed	Allowed	Variance	Flag
2024-02-08	97162	\$165.00	Not on extract	Not on extract	Missing ICD
2024-02-08	97110	\$85.00	Not on extract	Not on extract	Missing ICD
2024-02-08	97140	\$75.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-02-12	97110	\$170.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-02-22	97110	\$245.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-03-01	99214	\$240.00	Not on extract	Not on extract	
2024-03-05	70450	\$980.00	Not on extract	Not on extract	CPT/ICD mismatch

Date	CPT	Billed	Allowed	Variance	Flag
2024-03-05	99223	\$485.00	Not on extract	Not on extract	
	99233	\$310.00	Not on extract	Not on extract	
	11042	\$1,120.00	Not on extract	Not on extract	
	99239	\$275.00	Not on extract	Not on extract	
2024-03-11	99243	\$375.00	Not on extract	Not on extract	
2024-03-28	20610	\$285.00	Not on extract	Not on extract	Duplicate line; Unbundling conflict; CPT/ICD mismatch; Missing modifier 25; Bilateral modifier review
2024-03-28	99213	\$165.00	Not on extract	Not on extract	Unbundling conflict; Missing modifier 25
2024-04-05	97110	\$170.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-04-10	99455	\$275.00	Not on extract	Not on extract	
2024-04-10	99283	\$250.00	Not on extract	Not on extract	Missing modifier 25
2024-04-10	97110	\$4,950.00	Not on extract	Not on extract	Unbundling conflict; CPT/ICD mismatch
2024-04-10	20610	\$285.00	Not on extract	Not on extract	CPT/ICD mismatch; Missing modifier 25
2024-04-10	72148	\$1,200.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-04-10	62323	\$800.00	Not on extract	Not on extract	
2024-04-10	93000	\$85.00	Not on extract	Not on extract	CPT/ICD mismatch
2024-01-19	99285	\$1,240.00	Not on extract	Not on extract	Out Of Order Date
2024-01-19	96372	\$95.00	Not on extract	Not on extract	
2024-01-19	73030	\$210.00	Not on extract	Not on extract	Duplicate line
2024-01-24	99204	\$320.00	Not on extract	Not on extract	
2024-02-05	73221	\$1,850.00	Not on extract	Not on extract	
2023-12-15	99213	\$185.00	Not on extract	Not on extract	
2024-01-08	99213	\$185.00	Not on extract	Not on extract	
2024-02-18	99213	\$195.00	Not on extract	Not on extract	
2024-03-15	95908	\$890.00	Not on extract	Not on extract	
2024-03-18	73721	\$1,650.00	Not on extract	Not on extract	
2024-04-10	97010	\$8,150.00	Not on extract	Not on extract	

Unit & Modifier Review

Date	CPT	Units	Modifiers	Status	Note
2024-02-08	97162	1		reviewed	
2024-02-08	97110	1		insufficient data	Units/modifiers not present on the billing line
2024-02-08	97140	1	59	reviewed	Modifier 59 present — confirm distinct procedural service
2024-02-12	97110	2		reviewed	
2024-02-22	97110	1		reviewed	
2024-03-01	99214	1		reviewed	
2024-03-05	70450	1		reviewed	
2024-03-05	99223	1		reviewed	
	99233	1		insufficient data	Units/modifiers not present on the billing line
	11042	1		insufficient data	Units/modifiers not present on the billing line
	99239	1		insufficient data	Units/modifiers not present on the billing line
2024-03-11	99243	1		reviewed	
2024-03-28	20610	1	25	reviewed	Modifier 25 present — confirm separately identifiable E/M
2024-03-28	99213	1		insufficient data	Units/modifiers not present on the billing line
2024-04-05	97110	2		reviewed	

Date	CPT	Units	Modifiers	Status	Note
2024-04-10	99455	1		reviewed	
2024-04-10	99283	1		insufficient data	Units/modifiers not present on the billing line
2024-04-10	97110	33		reviewed	
2024-04-10	20610	1		insufficient data	Units/modifiers not present on the billing line
2024-04-10	72148	1		insufficient data	Units/modifiers not present on the billing line
2024-04-10	62323	1		insufficient data	Units/modifiers not present on the billing line
2024-04-10	93000	1		insufficient data	Units/modifiers not present on the billing line
2024-01-19	99285	1		reviewed	
2024-01-19	96372	1		insufficient data	Units/modifiers not present on the billing line
2024-01-19	73030	1		reviewed	
2024-01-24	99204	1		reviewed	
2024-02-05	73221	1		reviewed	
2023-12-15	99213	1		insufficient data	Units/modifiers not present on the billing line
2024-01-08	99213	1		insufficient data	Units/modifiers not present on the billing line
2024-02-18	99213	1		insufficient data	Units/modifiers not present on the billing line
2024-03-15	95908	1		insufficient data	Units/modifiers not present on the billing line
2024-03-18	73721	1		insufficient data	Units/modifiers not present on the billing line
2024-04-10	97010	1		reviewed	

Summary of Findings (Facility / Provider Rollup)

Findings streamlined into 1 facility/location and 7 provider rollup row(s); 30 detailed finding(s) retained for expansion

By Facility / Location

Facility / Location	Provider	Lines	Billed	Unsupported	Findings
Mountain View Imaging Center; Riverside Family Medicine; Quick Care Urgent Clinic; Metro General Hospital; Metro General Imaging; Harlan Shoulder Clinic; Peak Motion Physical Therapy; Metro Neuro Associates		33	\$27,960.00	\$1,705.00	25

By Provider

Legend (—): Provider (—): Provider attribution unavailable — billing line and adjacent clinical notes do not identify a billing/rendering clinician (OCR or source gap)

Provider	Lines	Billed	Missing ICD	Findings	Unsupported	Risk	Band
M. Harlan, MD	8	\$15,995.00	0	7	0	42	moderate
L. Cho, MD	1	\$1,850.00	0	0	0	0	low
J. Ruiz, DPT	4	\$590.00	2	4	0	40	moderate
S. Bernstein, MD	1	\$375.00	0	0	0	0	low
A. Nguyen, PA-C	2	\$370.00	2	0	0	16	low
K. Patel, MD	1	\$210.00	0	1	0	6	low
—	16	\$8,570.00	3	13	3	100	high

► Detailed findings (expand)

Deterministic Totals

\$27,960.00 TOTAL BILLED	\$25,860.00 TOTAL SUPPORTED

\$1,705.00 TOTAL UNSUPPORTED	\$395.00 TOTAL QUESTIONABLE
\$0.00 TOTAL OVERBILLED	\$0.00 TOTAL UNDERBILLED
\$0.00 INVOICE VARIANCE	

Narrative Interpretation

FINDINGS

See Authoritative Findings Digest above for QA, fraud score, missing ICD, unsupported CPT, and leverage (not restated here).

DEPOSITION-READY / EXPERT SUMMARY

Provisional (see QA status above). See Authoritative Findings Digest for QA status, fraud score, missing ICD, unsupported CPT, and litigation leverage (single source — not reprinted here). Collapsed counts — missing ICD: 7; unsupported CPT: 3; no same-day clinical: 0; Timing vs So C abstain: 33. Unsupported examples: CPT 99233 (DOS missing on billing extract); CPT 11042 (DOS missing on billing extract). Medical necessity flags: 10. Follow-up questions: - Do not treat figures as deposition-ready until billing QA gate passes (alias/OCR remediation). - Confirm whether same-day E/M + procedure notes support modifier -25. - Reconcile missing ICD lines against operative/office notes. - Ask billing custodian for fee schedule / remittance advice for variance lines

MEDICAL NECESSITY LAYER

Medical necessity layer reviewed 33 CPT line(s); 10 flagged not supported/denied/unsupported. Timing vs So C abstains for 33 row(s) — see legend

DEMAND LETTER TALKING POINTS

Billing audit reflects billed charges of \$27,960.00, unsupported \$1,705.00, and overbilling variance of \$0.00, with 30 deterministic finding(s) and compliance risk HIGH. Detailed QA/fraud/ICD/unsupported counts are in the Authoritative Findings Digest (not restated here). Fee schedule unavailable; request remittance advice / UCR schedule from billing custodian. Remittance advice unavailable; request RA / EOB / ERA from billing custodian

All dollar amounts and code flags computed by Billing Audit Engine v1.1.0; LLM did not calculate

Litigation Leverage

Litigation Leverage — Total Unsupported Charges \$1,705.00 | Compliance Risk HIGH | Unbundling / Modifier-25 flags: 6 rows

QA status and fraud-indicator score appear on the Executive Health Card / Authoritative Findings Digest — not restated in this headline

Compliance risk is a transparent heuristic from unsupported dollars and rule hits — not a legal conclusion

Settlement Utility

Negotiation anchor: unsupported billing mass of \$1,705.00 plus 30 deterministic finding(s) supports a plaintiff demand posture that treats billing integrity as an independent pressure point even where clinical liability remains contested. Defense should expect requests for remittance advice, fee schedules, and custodian testimony

Medical Necessity Layer

Medical necessity layer reviewed 33 CPT line(s); 10 flagged not supported/denied/unsupported. Timing vs So C abstains for 33 row(s) — see legend

Medical Necessity — Per CPT

Legend (—): Timing vs So C (—): Timing vs standard-of-care not determined from available extracts (no published So C timing table loaded). Missing ICD (—): No ICD is present on this billing line. Where the clinical narrative supports diagnosis coding, candidate codes are noted separately for coder reconciliation — not as certified assignments

Date	CPT	ICD	Necessity	Docs	Course OK	Timing vs SoC	Charge	Gap Type	CPT Commentary	Legal Translation	Rationale
2024-02-08	97162	—	not supported	supported	false	—	\$165.00	generic documentation coding gap	The chart may reference related care for CPT 97162, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=not supported; docs=supported). Therefore CPT 97162 cannot be supported on the present record	Unsupported CPT 97162 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-02-08	97110	—	not supported	supported	false	—	\$85.00	timed therapy gap	The chart references physical therapy or exercise, but documentation lacks required elements (skilled therapeutic exercise minutes and units). Therefore CPT 97110 cannot be supported	Unsupported CPT 97110 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-02-08	97140	M 75.102	indeterminate	partial	false	—	\$75.00	timed therapy gap	The chart references manual therapy or massage-style care, but documentation lacks required elements (timed skilled technique and minutes). Therefore CPT 97140 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=partial
2024-02-12	97110	M 75.102	indeterminate	supported	false	—	\$170.00	timed therapy gap	The chart references physical therapy or exercise, but documentation lacks required elements (skilled therapeutic exercise minutes and units). Therefore CPT 97110 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-02-22	97110	M 75.102	indeterminate	supported	false	—	\$245.00	timed therapy gap	The chart references physical therapy or exercise, but documentation lacks required elements (skilled therapeutic exercise minutes and units). Therefore CPT 97110 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-03-01	99214	M 25.512	supported	supported	false	—	\$240.00				ICD present and documentation binding supports the CPT
2024-03-05	70450	A 41.9	indeterminate	supported	false	—	\$980.00	generic documentation coding gap	The chart may reference related care for CPT 70450, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=indeterminate; docs=supported). Therefore CPT 70450 cannot be supported on the present record		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-03-05	99223	A 41.9	supported	supported	false	—	\$485.00				ICD present and documentation binding supports the CPT

Date	CPT	ICD	Necessity	Docs	Course OK	Timing vs SoC	Charge	Gap Type	CPT Commentary	Legal Translation	Rationale
	99233	A 41.9	unsupported	unsupported	false	—	\$310.00	generic documentation coding gap	The chart may reference related care for CPT 99233, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=unsupported; docs=unsupported). Therefore CPT 99233 cannot be supported on the present record	Unsupported CPT 99233 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
	11042	A 41.9	unsupported	unsupported	false	—	\$1,120.00	generic documentation coding gap	The chart may reference related care for CPT 11042, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=unsupported; docs=unsupported). Therefore CPT 11042 cannot be supported on the present record	Unsupported CPT 11042 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
	99239	A 41.9	unsupported	unsupported	false	—	\$275.00	generic documentation coding gap	The chart may reference related care for CPT 99239, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=unsupported; docs=unsupported). Therefore CPT 99239 cannot be supported on the present record	Unsupported CPT 99239 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No clinical event within ±1 day of DOS with CPT/procedure/ICD/provider match
2024-03-11	99243	G 56.02	supported	supported	false	—	\$375.00				ICD present and documentation binding supports the CPT
2024-03-28	20610	M 75.102	indeterminate	supported	false	—	\$285.00	procedure detail gap	The chart references an injection, but documentation lacks required elements (joint identified, laterality, substance injected, and indication/technique). Therefore CPT 20610 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-03-28	99213	R 51.9	supported	supported	false	—	\$165.00				ICD present and documentation binding supports the CPT
2024-04-05	97110	M 75.102	indeterminate	supported	false	—	\$170.00	timed therapy gap	The chart references physical therapy or exercise, but documentation lacks required elements (skilled therapeutic exercise minutes and units). Therefore CPT 97110 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-04-10	99455	M 75.102	supported	supported	false	—	\$275.00				ICD present and documentation binding supports the CPT
2024-04-10	99283	S 33.5 XXA	supported	supported	false	—	\$250.00				ICD present and documentation binding supports the CPT

Date	CPT	ICD	Necessity	Docs	Course OK	Timing vs SoC	Charge	Gap Type	CPT Commentary	Legal Translation	Rationale
2024-04-10	97110	M 75.102	indeterminate	supported	false	—	\$4,950.00	timed therapy gap	The chart references physical therapy or exercise, but documentation lacks required elements (skilled therapeutic exercise minutes and units). Therefore CPT 97110 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-04-10	20610	M 75.102	indeterminate	supported	false	—	\$285.00	procedure detail gap	The chart references an injection, but documentation lacks required elements (joint identified, laterality, substance injected, and indication/technique). Therefore CPT 20610 cannot be supported		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-04-10	72148	M 75.102	indeterminate	supported	false	—	\$1,200.00	generic documentation coding gap	The chart may reference related care for CPT 72148, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=indeterminate; docs=supported). Therefore CPT 72148 cannot be supported on the present record		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-04-10	62323	M 75.102	supported	supported	false	—	\$800.00				ICD present and documentation binding supports the CPT
2024-04-10	93000	M 75.102	indeterminate	supported	false	—	\$85.00	generic documentation coding gap	The chart may reference related care for CPT 93000, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=indeterminate; docs=supported). Therefore CPT 93000 cannot be supported on the present record		Not found in the extracted chronology for full necessity determination; doc status=supported
2024-01-19	99285	M 25.512	supported	supported	false	—	\$1,240.00				ICD present and documentation binding supports the CPT
2024-01-19	96372	M 25.512	supported	supported	false	—	\$95.00				ICD present and documentation binding supports the CPT
2024-01-19	73030	M 25.512	supported	supported	false	—	\$210.00				ICD present and documentation binding supports the CPT
2024-01-24	99204	S 46.012A	partial	partial	false	—	\$320.00	generic documentation coding gap	The chart may reference related care for CPT 99204, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=partial; docs=partial). Therefore CPT 99204 cannot be supported on the present record		Partial documentation support; clinical course review recommended
2024-02-05	73221	M 75.102	supported	supported	false	—	\$1,850.00				ICD present and documentation binding supports the CPT

Date	CPT	ICD	Necessity	Docs	Course OK	Timing vs SoC	Charge	Gap Type	CPT Commentary	Legal Translation	Rationale
2023-12-15	99213	—	not supported	supported	false	—	\$185.00	em level support gap	The chart references an office visit, but documentation lacks required low-complexity MDM support; when billed with a same-day procedure, a separately identifiable E/M (-25) must also be shown. Therefore CPT 99213 cannot be supported on the present record	High-level ED E/M without supporting MDM documentation creates upcoding exposure and weakens medical-necessity defense of the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-01-08	99213	—	not supported	supported	false	—	\$185.00	em level support gap	The chart references an office visit, but documentation lacks required low-complexity MDM support; when billed with a same-day procedure, a separately identifiable E/M (-25) must also be shown. Therefore CPT 99213 cannot be supported on the present record	High-level ED E/M without supporting MDM documentation creates upcoding exposure and weakens medical-necessity defense of the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-02-18	99213	—	not supported	supported	false	—	\$195.00	em level support gap	The chart references an office visit, but documentation lacks required low-complexity MDM support; when billed with a same-day procedure, a separately identifiable E/M (-25) must also be shown. Therefore CPT 99213 cannot be supported on the present record	High-level ED E/M without supporting MDM documentation creates upcoding exposure and weakens medical-necessity defense of the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-03-15	95908	—	not supported	supported	false	—	\$890.00	generic documentation coding gap	The chart may reference related care for CPT 95908, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=not supported; docs=supported). Therefore CPT 95908 cannot be supported on the present record	Unsupported CPT 95908 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-03-18	73721	—	not supported	supported	false	—	\$1,650.00	generic documentation coding gap	The chart may reference related care for CPT 73721, but the available documentation, ICD linkage, and/or coding rules do not establish medical necessity for the billed code (necessity=not supported; docs=supported). Therefore CPT 73721 cannot be supported on the present record	Unsupported CPT 73721 on this record supports a medical-necessity / coding-integrity challenge to the billed charge	No ICD linked to CPT; medical necessity cannot be established from billing line
2024-04-10	97010	M 75.102	supported	supported	false	—	\$8,150.00				ICD present and documentation binding supports the CPT

CPT-to-Treatment Timeline Overlay

Date	CPT	Billed Service	Clinical Events	Match	Gaps
	11042	CPT 11042		no clinical event same day	no same day clinical event, docs unsupported

Date	CPT	Billed Service	Clinical Events	Match	Gaps
	99233	CPT 99233		no clinical event same day	no same day clinical event, docs unsupported
	99239	CPT 99239		no clinical event same day	no same day clinical event, docs unsupported
2023-12-15	99213	Office/outpatient visit, established patient, low complexity	12/15/2023_58bca055	aligned	missing icd
2024-01-08	99213	Office/outpatient visit, established patient, low complexity	01/08/2024_fe85a096	aligned	missing icd
2024-01-19	73030	CPT 73030	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	aligned	
2024-01-19	96372	CPT 96372	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	aligned	
2024-01-19	99285	CPT 99285	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	aligned	
2024-01-24	99204	CPT 99204	01/24/2024_4f543a45	aligned	
2024-02-05	73221	CPT 73221	02/05/2024_2cbdae98	aligned	
2024-02-08	97110	Therapeutic exercises	02/08/2024_371c582c	aligned	missing icd
2024-02-08	97140	Manual therapy techniques	02/08/2024_371c582c	aligned	
2024-02-08	97162	CPT 97162	02/08/2024_371c582c	aligned	missing icd
2024-02-12	97110	Therapeutic exercises	02/12/2024_bb95c8cc	aligned	
2024-02-18	99213	Office/outpatient visit, established patient, low complexity	02/18/2024_ab811ef1	aligned	missing icd
2024-02-22	97110	Therapeutic exercises	02/22/2024_8726caa7	aligned	
2024-03-01	99214	Office/outpatient visit, established patient, moderate complexity	03/01/2024_66635856	aligned	
2024-03-05	70450	CT head/brain without contrast	03/05/2024_a84ed8be	aligned	
2024-03-05	99223	CPT 99223	03/05/2024_a84ed8be	aligned	
2024-03-11	99243	CPT 99243	03/11/2024_667cb6c7	aligned	
2024-03-15	95908	CPT 95908	03/15/2024_9c1fa928	aligned	missing icd
2024-03-18	73721	MRI joint of lower extremity without contrast	03/18/2024_f1d29417	aligned	missing icd
2024-03-28	20610	Arthrocentesis, major joint	03/28/2024_6ffe26da	aligned	
2024-03-28	99213	Office/outpatient visit, established patient, low complexity	03/28/2024_6ffe26da	aligned	
2024-04-05	97110	Therapeutic exercises	04/05/2024_593f7466	aligned	
2024-04-10	20610	Arthrocentesis, major joint	04/10/2024_d156fa3d	aligned	
2024-04-10	62323	CPT 62323	04/10/2024_d156fa3d	aligned	
2024-04-10	72148	MRI lumbar spine without contrast	04/10/2024_d156fa3d	aligned	
2024-04-10	93000	Electrocardiogram, complete	04/10/2024_d156fa3d	aligned	
2024-04-10	97010	Hot or cold packs	04/10/2024_d156fa3d	aligned	
2024-04-10	97110	Therapeutic exercises	04/10/2024_d156fa3d	aligned	
2024-04-10	99283	Emergency department visit, moderate severity	04/10/2024_d156fa3d	aligned	
2024-04-10	99455	CPT 99455	04/10/2024_d156fa3d	aligned	

Billing-to-Clinical Alignment Map

Alignment map for 33 CPT row(s); 10 with gaps/contradictions. Cross-link: Treatment Timeline Tier 3 clinical-course pack covers trajectory/adequacy; this map is billing-side CPT↔clinical alignment only

Alignment Map

Billed DOS	Clinical DOS	Δ Days	Explainability	Clinical	CPT	ICD	Docs	Gaps	Contradictions	Charge
			No same-day clinical event and no dated clinical event available for delta reconstruction — not merely a silent mismatch		11042	A 41.9	unsupported	no same day clinical event, docs unsupported	invoice variance, out of order date, missing icd for cpt, cpt icd mismatch, injection with unrelated dx	\$1,120.00
			No same-day clinical event and no dated clinical event available for delta reconstruction — not merely a silent mismatch		99233	A 41.9	unsupported	no same day clinical event, docs unsupported	invoice variance, out of order date, missing icd for cpt, cpt icd mismatch, injection with unrelated dx	\$310.00
			No same-day clinical event and no dated clinical event available for delta reconstruction — not merely a silent mismatch		99239	A 41.9	unsupported	no same day clinical event, docs unsupported	invoice variance, out of order date, missing icd for cpt, cpt icd mismatch, injection with unrelated dx	\$275.00
2023-12-15	2023-12-15	0	Billed DOS aligns with same-day clinical event	12/15/2023_58bca055	99213		supported	missing icd	unbundling conflict, missing modifier 25 em with procedure	\$185.00
2024-01-08	2024-01-08	0	Billed DOS aligns with same-day clinical event	01/08/2024_fe85a096	99213		supported	missing icd	unbundling conflict, missing modifier 25 em with procedure	\$185.00
2024-01-19	2024-01-19	0	Billed DOS aligns with same-day clinical event	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	73030	M 25.512	supported		duplicate line	\$210.00
2024-01-19	2024-01-19	0	Billed DOS aligns with same-day clinical event	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	96372	M 25.512	supported		duplicate line	\$95.00
2024-01-19	2024-01-19	0	Billed DOS aligns with same-day clinical event	01/19/2024_ae1a31c8; ; 01/19/2024_b1bc6979; ; 01/19/2024_3e028ff0	99285	M 25.512	supported		duplicate line	\$1,240.00
2024-01-24	2024-01-24	0	Billed DOS aligns with same-day clinical event	01/24/2024_4f543a45	99204	S 46.012A	partial			\$320.00
2024-02-05	2024-02-05	0	Billed DOS aligns with same-day clinical event	02/05/2024_2cbdae98	73221	M 75.102	supported			\$1,850.00
2024-02-08	2024-02-08	0	Billed DOS aligns with same-day clinical event	02/08/2024_371c582c	97110		supported	missing icd	unbundling conflict, missing icd for cpt, cpt icd mismatch	\$85.00
2024-02-08	2024-02-08	0	Billed DOS aligns with same-day clinical event	02/08/2024_371c582c	97140	M 75.102	partial		cpt icd mismatch	\$75.00
2024-02-08	2024-02-08	0	Billed DOS aligns with same-day clinical event	02/08/2024_371c582c	97162		supported	missing icd	missing icd for cpt	\$165.00
2024-02-12	2024-02-12	0	Billed DOS aligns with same-day clinical event	02/12/2024_bb95c8cc	97110	M 75.102	supported		unbundling conflict, missing icd for cpt, cpt icd mismatch	\$170.00
2024-02-18	2024-02-18	0	Billed DOS aligns with same-day clinical event	02/18/2024_ab811ef1	99213		supported	missing icd	unbundling conflict, missing modifier 25 em with procedure	\$195.00
2024-02-22	2024-02-22	0	Billed DOS aligns with same-day clinical event	02/22/2024_8726caa7	97110	M 75.102	supported		unbundling conflict, missing icd for cpt, cpt icd mismatch	\$245.00
2024-03-01	2024-03-01	0	Billed DOS aligns with same-day clinical event	03/01/2024_66635856	99214	M 25.512	supported			\$240.00
2024-03-05	2024-03-05	0	Billed DOS aligns with same-day clinical event	03/05/2024_a84ed8be	70450	A 41.9	supported		cpt icd mismatch	\$980.00
2024-03-05	2024-03-05	0	Billed DOS aligns with same-day clinical event	03/05/2024_a84ed8be	99223	A 41.9	supported			\$485.00
2024-03-11	2024-03-11	0	Billed DOS aligns with same-day clinical event	03/11/2024_667cb6c7	99243	G 56.02	supported			\$375.00
2024-03-15	2024-03-15	0	Billed DOS aligns with same-day clinical event	03/15/2024_9c1fa928	95908		supported	missing icd		\$890.00
2024-03-18	2024-03-18	0	Billed DOS aligns with same-day clinical event	03/18/2024_f1d29417	73721		supported	missing icd		\$1,650.00
2024-03-28	2024-03-28	0	Billed DOS aligns with same-day clinical event	03/28/2024_6ffe26da	20610	M 75.102	supported		duplicate line, unbundling conflict, cpt icd mismatch, injection with unrelated dx, missing modifier 25 em with procedure, bilateral modifier 50 review	\$285.00

Billed DOS	Clinical DOS	Δ Days	Explainability	Clinical	CPT	ICD	Docs	Gaps	Contradictions	Charge
2024-03-28	2024-03-28	0	Billed DOS aligns with same-day clinical event	03/28/2024_6ffe26da	99213	R 51.9	supported		duplicate line, unbundling conflict, missing modifier 25 em with procedure, bilateral modifier 50 review	\$165.00
2024-04-05	2024-04-05	0	Billed DOS aligns with same-day clinical event	04/05/2024_593f7466	97110	M 75.102	supported		unbundling conflict, missing icd for cpt, cpt icd mismatch	\$170.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	20610	M 75.102	supported		duplicate line, unbundling conflict, cpt icd mismatch, injection with unrelated dx, missing modifier 25 em with procedure, bilateral modifier 50 review	\$285.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	62323	M 75.102	supported		unbundling conflict, missing modifier 25 em with procedure	\$800.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	72148	M 75.102	supported		unbundling conflict, cpt icd mismatch, missing modifier 25 em with procedure	\$1,200.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	93000	M 75.102	supported		unbundling conflict, cpt icd mismatch, missing modifier 25 em with procedure	\$85.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	97010	M 75.102	supported		unbundling conflict, cpt icd mismatch, missing modifier 25 em with procedure	\$8,150.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	97110	M 75.102	supported		unbundling conflict, missing icd for cpt, cpt icd mismatch, missing modifier 25 em with procedure	\$4,950.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	99283	S 33.5 XXA	supported		unbundling conflict, missing modifier 25 em with procedure	\$250.00
2024-04-10	2024-04-10	0	Billed DOS aligns with same-day clinical event	04/10/2024_d156fa3d	99455	M 75.102	supported		unbundling conflict, missing modifier 25 em with procedure	\$275.00

Missed Billing Opportunities

No missed billing candidates.

Fraud Indicators

Indicator	Severity	Detail
duplicate line	medium	CPT 20610 on 2024-03-28 00:00:00
duplicate line	medium	CPT 73030 on 2024-01-19 00:00:00
unbundling conflict	medium	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
unbundling conflict	medium	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
unbundling conflict	medium	Hot/cold packs (97010) with therapeutic exercise (97110) — often bundled; confirm separate payment policy
missing icd for cpt	high	CPT 97162 billed without an associated ICD diagnosis code
missing icd for cpt	high	CPT 97110 billed without an associated ICD diagnosis code
cpt icd mismatch	medium	CPT 97140 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 70450 with ICD A 41.9 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 20610 with ICD M 75.102 is outside the configured medical-necessity allowlist
injection with unrelated dx	medium	Joint injection (20610) with headache diagnosis (R 51.9) — anatomic/diagnostic mismatch
cpt icd mismatch	medium	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 20610 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 72148 with ICD M 75.102 is outside the configured medical-necessity allowlist

Indicator	Severity	Detail
cpt icd mismatch	medium	CPT 93000 with ICD M 75.102 is outside the configured medical-necessity allowlist
cpt icd mismatch	medium	CPT 97010 with ICD M 75.102 is outside the configured medical-necessity allowlist
missing modifier 25 em with procedure	high	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
missing modifier 25 em with procedure	high	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
bilateral modifier 50 review	medium	Duplicate major joint injection (20610) same day — confirm bilateral modifier 50 or RT/LT
missing modifier 25 em with procedure	high	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable

Fraud Score Components

Headline score is on the Executive Health Card; components below.

Source	Indicator	Severity	Weight	Detail
fraud indicator	duplicate line	medium	7	CPT 20610 on 2024-03-28 00:00:00
fraud indicator	duplicate line	medium	7	CPT 73030 on 2024-01-19 00:00:00
fraud indicator	unbundling conflict	medium	7	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
fraud indicator	unbundling conflict	medium	7	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
fraud indicator	unbundling conflict	medium	7	Hot/cold packs (97010) with therapeutic exercise (97110) — often bundled; confirm separate payment policy
fraud indicator	missing icd for cpt	high	12	CPT 97162 billed without an associated ICD diagnosis code
fraud indicator	missing icd for cpt	high	12	CPT 97110 billed without an associated ICD diagnosis code
fraud indicator	cpt icd mismatch	medium	7	CPT 97140 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 70450 with ICD A 41.9 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 20610 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	injection with unrelated dx	medium	7	Joint injection (20610) with headache diagnosis (R 51.9) — anatomic/diagnostic mismatch
fraud indicator	cpt icd mismatch	medium	7	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 97110 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 20610 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 72148 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 93000 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	cpt icd mismatch	medium	7	CPT 97010 with ICD M 75.102 is outside the configured medical-necessity allowlist
fraud indicator	missing modifier 25 em with procedure	high	12	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
fraud indicator	missing modifier 25 em with procedure	high	12	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
fraud indicator	bilateral modifier 50 review	medium	7	Duplicate major joint injection (20610) same day — confirm bilateral modifier 50 or RT/LT
fraud indicator	missing modifier 25 em with procedure	high	12	Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
documentation support	unsupported	high	4	CPT 99233: unsupported
documentation support	unsupported	high	4	CPT 11042: unsupported
documentation support	unsupported	high	4	CPT 99239: unsupported

Provider-Specific Billing Profiles

Provider billing profiles for 6 named provider(s) plus 1 unattributed bucket(s)

Provider Profiles

Legend (—): Provider (—): Provider attribution unavailable — billing line and adjacent clinical notes do not identify a billing/rendering clinician (OCR or source gap)

Provider	Lines	Billed	Missing ICD	Findings	Unsupported	Risk	Band	Pattern
M. Harlan, MD	8	\$15,995.00	0	7	0	42	moderate	rules:cpt icd mismatch,missing modifier 25 em with procedure,unbundling conflict
L. Cho, MD	1	\$1,850.00	0	0	0	0	low	no flags
J. Ruiz, DPT	4	\$590.00	2	4	0	40	moderate	missing icd×2; rules:cpt icd mismatch,missing icd for cpt
S. Bernstein, MD	1	\$375.00	0	0	0	0	low	no flags
A. Nguyen, PA-C	2	\$370.00	2	0	0	16	low	missing icd×2
K. Patel, MD	1	\$210.00	0	1	0	6	low	rules:duplicate line
—	16	\$8,570.00	3	13	3	100	high	missing icd×3; rules:bilateral modifier 50 review,cpt icd mismatch,duplicate line,missing modifier 25 em with procedure

Billing Consistency Check

Date	CPT	Modifier	Units	Status	Event ID	Evidence	Summary
2024-02-08	97140	59	1	partial	2024-02-08_371c582c	ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 Purpose: PT eval + multi-session plan (trajectory baseline) BATES-000009 ====	Modifier 59 on CPT 97140 with multiple same-day procedure CPTs (97110, 97140, 97162); clinical note does not explicitly document distinctness
2024-02-12	97110		2	partial	2024-02-12_bb95c8cc	...till avoids overhead work. Billing: CPT 97110 x2 units \$170.00 ICD M 75.102 Therapist: J. Ruiz, DPT — End Encounter 10 / Page...	2 units of 97110 have therapy language [event_id: 02/12/2024_bb95c8cc, date: 2024-02-12] but no timed duration (expected ≥ 16 minutes under 8-minute rule)
2024-03-28	20610	25	1	consistent	2024-03-28_6ffe26da	...24 Purpose: Office steroid injection; E/M+20610 modifier 25 pattern BATES-000022 Harlan Shoulder Clinic — PROCEDURE NOTE...	Modifier 25 supported by same-DOS E/M clinical evidence [event_id: 03/28/2024_6ffe26da, date: 2024-03-28] (signal: e/m)
2024-04-05	97110		2	partial	2024-04-05_593f7466	...I goals mostly met. Plan: Transition to home exercise program. Discuss MMI with ortho. Billing: CPT 97110 x2 \$170.00 CPT 97530 \$90.00...	2 units of 97110 have therapy language [event_id: 04/05/2024_593f7466, date: 2024-04-05] but no timed duration (expected ≥ 16 minutes under 8-minute rule)
2024-04-10	97110		33	partial	2024-04-10_d156fa3d	...striction: no lifting >25 lb overhead. Home exercise program continued. PT discharged. Functional limitations: difficulty lifting ar...	33 units of 97110 have therapy language [event_id: 04/10/2024_d156fa3d, date: 2024-04-10] but no timed duration (expected ≥264 minutes under 8-minute rule)

Payer-Specific Denial Likelihood (Estimates)

Payer denial likelihood estimates for 33 CPT line(s). Heuristic estimate from configured audit rules and documentation binding — not a payer determination, NCCI edit, or guarantee of denial/payment. Full NCCI / commercial payer corpus is not loaded

Denial Likelihood by CPT

Date	CPT	Medicare %	Band	Commercial %	WC %	Drivers
2024-02-08	97162	48	moderate	50	60	missing icd for cpt
2024-02-08	97110	48	moderate	50	60	missing icd for cpt
2024-02-08	97140	48	moderate	49	53	cpt icd mismatch
2024-02-12	97110	43	moderate	44	48	cpt icd mismatch
2024-02-22	97110	43	moderate	44	48	cpt icd mismatch
2024-03-01	99214	18	low	22	28	baseline only
2024-03-05	70450	43	moderate	44	48	cpt icd mismatch
2024-03-05	99223	18	low	22	28	baseline only
	99233	33	elevated	37	43	docs:unsupported
	11042	33	elevated	37	43	docs:unsupported
	99239	33	elevated	37	43	docs:unsupported
2024-03-11	99243	18	low	22	28	baseline only

Date	CPT	Medicare %	Band	Commercial %	WC %	Drivers
2024-03-28	20610	100	high	100	100	duplicate line, unbundling conflict, cpt icd mismatch, missing modifier 25 em with procedure
2024-03-28	99213	100	high	100	100	unbundling conflict, missing modifier 25 em with procedure
2024-04-05	97110	43	moderate	44	48	cpt icd mismatch
2024-04-10	99455	18	low	22	28	baseline only
2024-04-10	99283	56	moderate	64	58	missing modifier 25 em with procedure
2024-04-10	97110	78	high	74	73	unbundling conflict, cpt icd mismatch
2024-04-10	20610	81	high	86	78	cpt icd mismatch, missing modifier 25 em with procedure
2024-04-10	72148	43	moderate	44	48	cpt icd mismatch
2024-04-10	62323	18	low	22	28	baseline only
2024-04-10	93000	43	moderate	44	48	cpt icd mismatch
2024-01-19	99285	18	low	22	28	baseline only
2024-01-19	96372	18	low	22	28	baseline only
2024-01-19	73030	68	moderate	67	68	duplicate line
2024-01-24	99204	23	elevated	27	33	baseline only
2024-02-05	73221	18	low	22	28	baseline only
2023-12-15	99213	18	low	22	28	baseline only
2024-01-08	99213	18	low	22	28	baseline only
2024-02-18	99213	18	low	22	28	baseline only
2024-03-15	95908	18	low	22	28	baseline only
2024-03-18	73721	18	low	22	28	baseline only
2024-04-10	97010	18	low	22	28	baseline only

RVU / Workload Analysis

Fee schedule unavailable; request remittance advice / UCR schedule from billing custodian

Remittance advice unavailable; request RA / EOB / ERA from billing custodian

Visual Billing Timeline

Mirrors the CPT Code Timeline (one marker per billing line). Repeated CPT/date charges are extract-row listings; only Fraud Indicators *duplicate_line* findings mean same date + CPT + provider.

Date	Event	Charge
	11042 — CPT 11042	\$1,120.00
	99233 — CPT 99233	\$310.00
	99239 — CPT 99239	\$275.00
2023-12-15	99213 — Office/outpatient visit, established patient, low complexity	\$185.00
2024-01-08	99213 — Office/outpatient visit, established patient, low complexity	\$185.00
2024-01-19	73030 — CPT 73030	\$210.00
2024-01-19	96372 — CPT 96372	\$95.00
2024-01-19	99285 — CPT 99285	\$1,240.00
2024-01-24	99204 — CPT 99204	\$320.00
2024-02-05	73221 — CPT 73221	\$1,850.00
2024-02-08	97110 — Therapeutic exercises	\$85.00
2024-02-08	97140 — Manual therapy techniques	\$75.00
2024-02-08	97162 — CPT 97162	\$165.00
2024-02-12	97110 — Therapeutic exercises	\$170.00

Date	Event	Charge
2024-02-18	99213 — Office/outpatient visit, established patient, low complexity	\$195.00
2024-02-22	97110 — Therapeutic exercises	\$245.00
2024-03-01	99214 — Office/outpatient visit, established patient, moderate complexity	\$240.00
2024-03-05	70450 — CT head/brain without contrast	\$980.00
2024-03-05	99223 — CPT 99223	\$485.00
2024-03-11	99243 — CPT 99243	\$375.00
2024-03-15	95908 — CPT 95908	\$890.00
2024-03-18	73721 — MRI joint of lower extremity without contrast	\$1,650.00
2024-03-28	20610 — Arthrocentesis, major joint	\$285.00
2024-03-28	99213 — Office/outpatient visit, established patient, low complexity	\$165.00
2024-04-05	97110 — Therapeutic exercises	\$170.00
2024-04-10	20610 — Arthrocentesis, major joint	\$285.00
2024-04-10	62323 — CPT 62323	\$800.00
2024-04-10	72148 — MRI lumbar spine without contrast	\$1,200.00
2024-04-10	93000 — Electrocardiogram, complete	\$85.00
2024-04-10	97010 — Hot or cold packs	\$8,150.00
2024-04-10	97110 — Therapeutic exercises	\$4,950.00
2024-04-10	99283 — Emergency department visit, moderate severity	\$250.00
2024-04-10	99455 — CPT 99455	\$275.00

Unbundling Vulnerability

6 unbundling / -25 vulnerability row(s); charge mass at risk \$23,555.00

Unbundling / -25 Rows

Date	Issue	CPT Pair	Modifiers	Severity	At Risk	Detail
2024-03-28	unbundling conflict	20610 + 99213		medium	\$450.00	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
2024-03-28	unbundling conflict	99213 + 20610		medium	\$165.00	Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
2024-04-10	unbundling conflict	97110 + 97010		medium	\$4,950.00	Hot/cold packs (97010) with therapeutic exercise (97110) — often bundled; confirm separate payment policy
2024-03-28	same day em procedure without 25	E/M 99213 + procedure 20610	25 absent	high	\$450.00	Same-day E/M + procedure without modifier -25 (heuristic; confirm separately identifiable E/M)
2024-04-10	same day em procedure without 25	E/M 99283 + procedure 20610, 62323, 72148, 93000, 97010, 97110, 99455	25 absent	high	\$15,995.00	Same-day E/M + procedure without modifier -25 (heuristic; confirm separately identifiable E/M)
2024-01-19	same day em procedure without 25	E/M 99285 + procedure 73030, 96372	25 absent	high	\$1,545.00	Same-day E/M + procedure without modifier -25 (heuristic; confirm separately identifiable E/M)

Billing Performance by Facility/Provider

Billing performance rollup across 1 facility/location bucket(s). Facility column not present on billing lines; rollup uses location proxy, Tier-1 facilities label, or provider

Performance Rollup

Facility / Location	Provider	Lines	Billed	Unsupported	Findings
Mountain View Imaging Center; Riverside Family Medicine; Quick Care Urgent Clinic; Metro General Hospital; Metro General Imaging; Harlan Shoulder Clinic; Peak Motion Physical Therapy; Metro Neuro Associates		33	\$27,960.00	\$1,705.00	25

Data Remediation Roadmap

Data remediation roadmap (22 step(s)) for QA status=warn

Remediation Steps

Priority	Issue	Action
medium	Blocking ingestion flag: ocr csv unmapped — 50 OCR row(s)	Inspect billing source quality and re-run audit after fix
medium	Chronology inferred DOS for 2 billing line(s); native Excel billing export is still recommended before deposition use	Inspect billing source quality and re-run audit after fix
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
high	ocr csv unmapped: 50 OCR row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 2 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 2 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
high	invalid date of service: Missing or invalid date of service	Review ingestion flag and correct source file
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 1 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 1 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 2 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 4 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use
high	invalid date of service: Missing or invalid date of service	Review ingestion flag and correct source file
high	invalid date of service: Missing or invalid date of service	Review ingestion flag and correct source file
high	invalid date of service: Missing or invalid date of service	Review ingestion flag and correct source file
low	ocr csv source: See ingestion log	Review ingestion flag and correct source file
medium	ocr csv heuristic parse: 3 heuristically mapped row(s)	Prefer native Excel billing export over OCR CSV; if OCR-only, verify column detection and currency parsing before deposition use

Demand Letter Talking Points

Billing audit reflects billed charges of \$27,960.00, unsupported \$1,705.00, and overbilling variance of \$0.00, with 30 deterministic finding(s) and compliance risk HIGH. Detailed QA/fraud/ICD/unsupported counts are in the Authoritative Findings Digest (not restated here). Fee schedule unavailable; request remittance advice / UCR schedule from billing custodian. Remittance advice unavailable; request RA / EOB / ERA from billing custodian

Deposition-Ready Billing Summary

Provisional (see QA status above). See Authoritative Findings Digest for QA status, fraud score, missing ICD, unsupported CPT, and litigation leverage (single source — not reprinted here). Collapsed counts — missing ICD: 7; unsupported CPT: 3; no same-day clinical: 0; Timing vs So C abstain: 33. Unsupported examples: CPT 99233 (DOS missing on billing extract); CPT 11042 (DOS missing on billing extract). Medical necessity flags: 10. Follow-up questions: - Do not treat figures as deposition-ready until billing QA gate passes (alias/OCR remediation). - Confirm whether same-day E/M + procedure notes support modifier -25. - Reconcile missing ICD lines against operative/office notes. - Ask billing custodian for fee schedule / remittance advice for variance lines

Provider-Level Billing Attribution

Provider/facility attribution for 33 CPT line(s); 17 with identifiable provider, 16 abstained — see legend

Attribution by CPT

Legend (—): Provider (—): Provider attribution unavailable — billing line and adjacent clinical notes do not identify a billing/rendering clinician (OCR or source gap). Facility (—): Facility not identifiable on billing line or near-DOS chronology (OCR / field gaps). NPI (—): Attribution unavailable due to OCR limitations

Date	CPT	Submitting	Facility	Billing NPI	Clinical	Clinical NPI	NPI Match	Component	Scope	Charge
2024-02-08	97162	J. Ruiz, DPT	Peak Motion Physical Therapy	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$165.00
2024-02-08	97110	J. Ruiz, DPT	Peak Motion Physical Therapy	—	—	—	abstain	unknown	Therapy CPT with PT-credential signal nearby — heuristic only	\$85.00
2024-02-08	97140	—	Peak Motion Physical Therapy	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$75.00
2024-02-12	97110	J. Ruiz, DPT	—	—	—	—	abstain	unknown	Therapy CPT with PT-credential signal nearby — heuristic only	\$170.00
2024-02-22	97110	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$245.00
2024-03-01	99214	—	Quick Care Urgent Clinic	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$240.00
2024-03-05	70450	—	Metro General Hospital	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$980.00
2024-03-05	99223	—	Metro General Hospital	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$485.00
	99233	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$310.00
	11042	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$1,120.00
	99239	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$275.00
2024-03-11	99243	S. Bernstein, MD	Metro Neuro Associates	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$375.00
2024-03-28	20610	—	Harlan Shoulder Clinic	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$285.00
2024-03-28	99213	—	Harlan Shoulder Clinic	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$165.00
2024-04-05	97110	J. Ruiz, DPT	—	—	—	—	abstain	unknown	Therapy CPT with PT-credential signal nearby — heuristic only	\$170.00
2024-04-10	99455	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$275.00
2024-04-10	99283	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$250.00
2024-04-10	97110	M. Harlan, MD	—	—	—	—	abstain	unknown	Therapy CPT attributed near physician credential without PT signal — confirm allowed-to-bill / incident-to (heuristic)	\$4,950.00
2024-04-10	20610	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$285.00
2024-04-10	72148	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$1,200.00
2024-04-10	62323	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$800.00
2024-04-10	93000	M. Harlan, MD	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$85.00
2024-01-19	99285	—	Metro General Hospital	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$1,240.00
2024-01-19	96372	—	Metro General Hospital	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$95.00
2024-01-19	73030	K. Patel, MD	Metro General Hospital	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$210.00
2024-01-24	99204	—	Harlan Shoulder Clinic	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$320.00
2024-02-05	73221	L. Cho, MD	Mountain View Imaging Center	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$1,850.00
2023-12-15	99213	A. Nguyen, PA-C	Riverside Family Medicine	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$185.00

Date	CPT	Submitting	Facility	Billing NPI	Clinical	Clinical NPI	NPI Match	Component	Scope	Charge
2024-01-08	99213	A. Nguyen, PA-C	Quick Care Urgent Clinic	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$185.00
2024-02-18	99213	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$195.00
2024-03-15	95908	—	—	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$890.00
2024-03-18	73721	—	Mountain View Imaging Center	—	—	—	abstain	unknown	Scope-of-practice / allowed-to-bill not determined from available credentials (light heuristic abstains)	\$1,650.00
2024-04-10	97010	M. Harlan, MD	—	—	—	—	abstain	unknown	Therapy CPT attributed near physician credential without PT signal — confirm allowed-to-bill / incident-to (heuristic)	\$8,150.00

DOS Reconstruction & Timeline Alignment

DOS reconstruction for 33 unique CPT row(s); 0 with delta or same-day gap

DOS Delta Table

CPT	Billed DOS	Clinical DOS	Δ Days	Support
11042	DOS missing on billing extract	—	<i>n/a — clinical DOS unavailable</i>	unsupported — Supporting clinical evidence not bound to this CPT line from available extracts
99233	DOS missing on billing extract	—	<i>n/a — clinical DOS unavailable</i>	unsupported — Supporting clinical evidence not bound to this CPT line from available extracts
99239	DOS missing on billing extract	—	<i>n/a — clinical DOS unavailable</i>	unsupported — Supporting clinical evidence not bound to this CPT line from available extracts
99213	2023-12-15	2023-12-15	0	supported
99213	2024-01-08	2024-01-08	0	supported
73030	2024-01-19	2024-01-19	0	supported
96372	2024-01-19	2024-01-19	0	supported
99285	2024-01-19	2024-01-19	0	supported
99204	2024-01-24	2024-01-24	0	partial
73221	2024-02-05	2024-02-05	0	supported
97110	2024-02-08	2024-02-08	0	supported
97140	2024-02-08	2024-02-08	0	partial
97162	2024-02-08	2024-02-08	0	supported
97110	2024-02-12	2024-02-12	0	supported
99213	2024-02-18	2024-02-18	0	supported
97110	2024-02-22	2024-02-22	0	supported
99214	2024-03-01	2024-03-01	0	supported
70450	2024-03-05	2024-03-05	0	supported
99223	2024-03-05	2024-03-05	0	supported
99243	2024-03-11	2024-03-11	0	supported
95908	2024-03-15	2024-03-15	0	supported
73721	2024-03-18	2024-03-18	0	supported
20610	2024-03-28	2024-03-28	0	supported
99213	2024-03-28	2024-03-28	0	supported
97110	2024-04-05	2024-04-05	0	supported
20610	2024-04-10	2024-04-10	0	supported
62323	2024-04-10	2024-04-10	0	supported
72148	2024-04-10	2024-04-10	0	supported
93000	2024-04-10	2024-04-10	0	supported

CPT	Billed DOS	Clinical DOS	Δ Days	Support
97010	2024-04-10	2024-04-10	0	supported
97110	2024-04-10	2024-04-10	0	supported
99283	2024-04-10	2024-04-10	0	supported
99455	2024-04-10	2024-04-10	0	supported

ICD Reconstruction & Candidate Mapping

ICD reconstruction reviewed 33 CPT line(s); 7 missing billed ICD; 7 clinical candidate(s)

ICD candidates are heuristic extractions/phrase maps from clinical narrative — not a certified coder determination

ICD Candidates by CPT

Legend (—): Missing ICD / candidates (—): No ICD is present on this billing line. Where the clinical narrative supports diagnosis coding, candidate codes are noted separately for coder reconciliation — not as certified assignments

Date	CPT	Billed ICD	Candidates	Omission Class	Docs	Charge
2024-02-08	97162	—	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	clerical	supported	\$165.00
2024-02-08	97110	—	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	clerical	supported	\$85.00
2024-02-08	97140	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	partial	\$75.00
2024-02-12	97110	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$170.00
2024-02-22	97110	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$245.00
2024-03-01	99214	M 25.512	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$240.00
2024-03-05	70450	A 41.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$980.00
2024-03-05	99223	A 41.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$485.00
	99233	A 41.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	unsupported	\$310.00
	11042	A 41.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	unsupported	\$1,120.00
	99239	A 41.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	unsupported	\$275.00
2024-03-11	99243	G 56.02	M 25.511 (heuristic), M 54.16 (heuristic)	not omitted	supported	\$375.00
2024-03-28	20610	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$285.00
2024-03-28	99213	R 51.9	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$165.00
2024-04-05	97110	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$170.00
2024-04-10	99455	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$275.00
2024-04-10	99283	S 33.5 XXA	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$250.00
2024-04-10	97110	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$4,950.00
2024-04-10	20610	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$285.00
2024-04-10	72148	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$1,200.00
2024-04-10	62323	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$800.00
2024-04-10	93000	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$85.00
2024-01-19	99285	M 25.512	S 80.00 XA (heuristic), S 72.001A (heuristic)	not omitted	supported	\$1,240.00
2024-01-19	96372	M 25.512	S 80.00 XA (heuristic), S 72.001A (heuristic)	not omitted	supported	\$95.00
2024-01-19	73030	M 25.512	S 80.00 XA (heuristic), S 72.001A (heuristic)	not omitted	supported	\$210.00
2024-01-24	99204	S 46.012A	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	partial	\$320.00
2024-02-05	73221	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$1,850.00
2023-12-15	99213	—	M 54.5 (heuristic), S 39.012A (heuristic)	clerical	supported	\$185.00
2024-01-08	99213	—	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	clerical	supported	\$185.00
2024-02-18	99213	—	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	clerical	supported	\$195.00

Date	CPT	Billed ICD	Candidates	Omission Class	Docs	Charge
2024-03-15	95908	—	S 72.001A (heuristic)	clerical	supported	\$890.00
2024-03-18	73721	—	S 72.001A (heuristic)	clerical	supported	\$1,650.00
2024-04-10	97010	M 75.102	M 54.5 (heuristic), S 39.012A (heuristic), S 80.00 XA (heuristic)	not omitted	supported	\$8,150.00

Payer Policy / NCCI Edits (Heuristic)

Heuristic NCCI/payer edit review: 17 concrete flag(s) (engine:bilateral modifier 50 review=1, engine:missing modifier 25 em with procedure=2, engine:unbundling conflict=3, heuristic ncci bundle=3, laterality rt lt review=4, modifier 25 review=3, modifier 59 review=1). Full CMS NCCI PTP / MUE tables are NOT loaded — all edits labeled heuristic. LCD/NCD references are placeholders only

Heuristic bundling/MU/-25/-59/RT-LT review only — not a substitute for CMS NCCI PTP edits or payer-specific policy

Heuristic Edit Rows

Date	Edit Type	CPT Pair	-25 Note	Fac/Prof	LCD/NCD	Label	Detail
2024-02-08	heuristic ncci bundle	97110 + 97140		Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	LCD/NCD: outpatient PT timed codes / therapy cap context (not loaded)		Manual therapy (97140) and therapeutic exercise (97110) billed same day — review for NCCI edit / modifier
2024-02-08	modifier 59 review	97110 + 97140	Modifier -59 / X{EPSU} absent — pair often edits as bundled unless distinct		LCD/NCD corpus not loaded		Timed therapy/distinct-service pair 97110 + 97140 on same DOS — heuristic NCCI-style -59 / X{EPSU} review
2024-03-28	heuristic ncci bundle	20610 + 99213		Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	LCD/NCD: joint injection medical necessity / coverage (jurisdiction-specific — not loaded)		Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
2024-03-28	modifier 25 review	E/M 99213 + procedure 20610	Modifier -25 absent — E/M often bundled into procedure unless separately identifiable service is documented	Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	LCD/NCD corpus not loaded		Same-day E/M + procedure -25 review (heuristic)
2024-03-28	laterality rt lt review	20610	RT/LT/-50 not documented on billing modifiers		LCD/NCD corpus not loaded		CPT 20610 is laterality-sensitive; RT/LT/-50 not present on line — confirm site laterality in operative/office note (heuristic)
2024-04-10	heuristic ncci bundle	97110 + 97010		Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	LCD/NCD: outpatient PT timed codes / therapy cap context (not loaded)		Hot/cold packs (97010) with therapeutic exercise (97110) — often bundled; confirm separate payment policy
2024-04-10	modifier 25 review	E/M 99283 + procedure 20610, 62323, 72148, 93000, 97010, 97110, 99455	Modifier -25 absent — E/M often bundled into procedure unless separately identifiable service is documented	Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	LCD/NCD corpus not loaded		Same-day E/M + procedure -25 review (heuristic)
2024-04-10	laterality rt lt review	20610	RT/LT/-50 not documented on billing modifiers		LCD/NCD corpus not loaded		CPT 20610 is laterality-sensitive; RT/LT/-50 not present on line — confirm site laterality in operative/office note (heuristic)
2024-01-19	modifier 25 review	E/M 99285 + procedure 73030, 96372	Modifier -25 absent — E/M often bundled into procedure unless separately identifiable service is documented	Facility vs professional / global vs technical not inferable from modifiers or place of service on this line	NCD/LCD: ED E/M leveling not typically LCD-driven; MDM documentation still required		Same-day E/M + procedure -25 review (heuristic)
2024-01-19	laterality rt lt review	73030	RT/LT/-50 not documented on billing modifiers		LCD/NCD corpus not loaded		CPT 73030 is laterality-sensitive; RT/LT/-50 not present on line — confirm site laterality in operative/office note (heuristic)
2024-03-18	laterality rt lt review	73721	RT/LT/-50 not documented on billing modifiers		LCD/NCD corpus not loaded		CPT 73721 is laterality-sensitive; RT/LT/-50 not present on line — confirm site laterality in operative/office note (heuristic)

Date	Edit Type	CPT Pair	-25 Note	Fac/Prof	LCD/NCD	Label	Detail
2024-03-28	engine:unbundling conflict	20610 + 99213			LCD/NCD: joint injection medical necessity / coverage (jurisdiction-specific — not loaded)		Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
2024-03-28	engine:unbundling conflict	99213 + 20610			LCD/NCD corpus not loaded		Joint injection (20610) with same-day office visit (99213) — confirm significant separately identifiable E/M (modifier 25)
2024-04-10	engine:unbundling conflict	97110 + 97010			LCD/NCD: outpatient PT timed codes / therapy cap context (not loaded)		Hot/cold packs (97010) with therapeutic exercise (97110) — often bundled; confirm separate payment policy
2024-03-28	engine:missing modifier 25 em with procedure	99213 + 20610	See engine finding — separately identifiable E/M required for -25		LCD/NCD corpus not loaded		Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable
2024-03-28	engine:bilateral modifier 50 review	20610 + 20610			LCD/NCD: joint injection medical necessity / coverage (jurisdiction-specific — not loaded)		Duplicate major joint injection (20610) same day — confirm bilateral modifier 50 or RT/LT
2024-04-10	engine:missing modifier 25 em with procedure	99283 + 20610	See engine finding — separately identifiable E/M required for -25		LCD/NCD corpus not loaded		Same-day E/M with procedure — modifier 25 required on the E/M when separately identifiable

Billing Custodian Questions

Billing custodian / subpoena checklist focused on records, remittance advice, fee schedules, and testimony on coding attribution. Audit source=ocr csv; lines=33

Subpoena / Custodian Checklist

Priority	Category	Item
critical	data quality	Explain QA gate status=warn and produce clean typed billing source before deposition use
critical	records	Complete itemized billing / UB-04 or CMS-1500 equivalents for all DOS in dispute
critical	records	Charge master / fee schedule in effect on each DOS (or attestation none exists)
critical	remittance	Remittance advice / EOB / ERA for each claim line (allowed, paid, adjustments, denial codes)
high	custodian testimony	Billing custodian of records — how charges are posted, who assigns CPT/ICD, audit trail
high	custodian testimony	Testimony on modifier application (-25/-59/26/TC) and same-day E/M+procedure policy
high	records	Native electronic billing export (Excel/EDI) preferred over OCR PDF extracts
medium	records	Provider NPI roster linking rendering vs billing providers for attributed lines
medium	policy	Payer contracts / NCCI application notes / LCD citations relied upon for denials or payments
critical	records	Produce clinical documentation purported to support \$1,705.00 charges

Final Expert Opinion (Billing)

Provisional (see QA status above). Billing expert synthesis (heuristic): primary pattern appears ****clerical coding gaps**** with secondary signals [systemic documentation failure, upcoding or unbundling pattern]. Unsupported charges \$1,705.00; findings=30; necessity flags=10; missing ICD lines=7; unbundling/-25 rows=6; fraud-indicator score=100/100. This is not a finding of fraud, intent, or liability

Expert Conclusion

Provisional (see QA status above). In the undersigned consultant's working opinion, the billing extract is most consistent with a clerical coding gaps pattern. Approximately \$1,705.00 in charges lack adequate documentation support on the present record, with 7 missing-ICD line(s); 10 medical-necessity flag(s); 6 unbundling/-25 vulnerability row(s). Compliance risk is assessed as HIGH; settlement posture is plaintiff pressure high, favoring write-down / offset of unsupported and overbilled specials while preserving discovery pressure for remittance advice and fee schedules. Fee schedule unavailable; request remittance advice / UCR schedule from billing custodian. Remittance advice unavailable; request RA / EOB / ERA from billing custodian. Further refinement is reserved pending native billing export, remittance advice, and fee-schedule production. This conclusion is not a finding of fraud, intent, or liability

Heuristic expert-style synthesis from deterministic audit outputs — not a sworn expert report and not a finding of fraud or liability

Damages & Settlement Leverage

Damages & settlement leverage — compliance risk HIGH; posture plaintiff pressure high

Plaintiff Leverage

- Unsupported charge mass \$1,705.00 independently pressures specials
- Overbilling variance \$0.00 supports write-down / offset arguments
- Unbundling / Modifier-25 vulnerability (\$23,555.00) supports coding integrity attacks
- Fraud-indicator score 100/100 (heuristic) elevates discovery urgency

Defense Vulnerabilities

- Produce remittance advice and fee schedule or face adverse inference on charge reasonableness
- Same-day E/M + procedure without -25 documentation invites bundling challenges
- QA-provisional billing extract — defense may attack completeness of plaintiff's billing proof

Offsets

- Offset/write-down unsupported and overbilled amounts against claimed medical specials
- Reserve lien/ERISA/Medicare conditional payment reconciliation after remittance review

Liability Interaction

Billing integrity issues operate as damages/specials leverage and credibility pressure even when negligence/liability remains contested; they do not alone prove liability

Heuristic estimate from configured audit rules and documentation binding — not a payer determination, NCCI edit, or guarantee of denial/payment

Attorney-Ready One-Page Billing Summary

- Unsupported charges: \$1,705.00 (billed \$27,960.00)
- Missing ICDs: 7 line(s)
- Documentation gaps: 3 unsupported/contradicted CPT line(s); necessity flags 10
- Compliance risk: HIGH; fraud-indicator score 100/100
- Working pattern: clerical coding gaps (QA=warn; provisional)

Next Steps

- Remediate billing QA failures before deposition use
- Issue custodian subpoena for itemized bills, remittance advice, and fee schedules
- Reconcile missing ICD / DOS-delta lines against native chart notes
- Use unsupported \$ as settlement write-down anchor in specials negotiations
- Work top custodian items: Explain QA gate status=warn and produce clean typed billing source before deposition use

Computation Notice

All dollar amounts and code flags computed by Billing Audit Engine v1.1.0; LLM did not calculate

QUALITY ASSURANCE: WARN — PROVISIONAL

RITA V1.3.1 - QA Warn (Provisional) · Protocol v1.3.1 · Generated 2026-08-02T23:33:08+00:00

QA checks flagged 1 issue(s), or billing QA is provisional. Review before relying on this report in litigation deliverables.

- Billing Analysis QA gate status=warn. Closing banner must remain provisional — not VERIFIED.
- Pod billing: upstream billing_qa_gate=warn. Certification cannot be VERIFIED.

Pod billing · ledger sha256:23db6105 · quality=provisional · qa_gate=warn