

Payment Policy: Clean Claims

Reference Number: PA.CC.PP.021

Product Types: ALL

Effective Date: 11/1/2019

Last Review Date:

[Coding Implications](#)

[Revision Log](#)

See [Important Reminder](#) at the end of this policy for important regulatory and legal information.

Policy Overview

The purpose of this policy is to define the minimum claim submission requirements for claims submitted to the health plan for processing from all providers, including facilities (e.g., hospitals, ambulatory surgery centers) and professional providers (e.g., physicians, independent therapists).

Application

This policy applies to all claims received by the health plan submitted by facilities and individual providers for review, adjudication, and processing.

Policy Description

Consistent with Federal and State law and contractual obligations, the health plan is responsible for timely adjudicating a claim only when it is a “Clean Claim.”

Clean Claim

A Clean Claim is defined as a claim received by the health plan for adjudication that has been completed and submitted without technical defect in its form, completion, or content. In order to constitute a Clean Claim, the claim must necessarily: a) comply with all standard coding guidelines; b) contain no missing information; and c) be free of any potential defect or impropriety due to unbundling, incorrect or obsolete coding, or medical necessity. Further, a Clean Claim must include all substantiating documentation that the health plan deems necessary for its adjudication, and not require special processing or consideration, which would otherwise delay or prevent timely payment of the claim. In addition, the following types of claims shall not constitute a Clean Claim: (a) a claim for which fraud is detected or suspected; and (b) a claim for which a third-party payer may be responsible.

Clean claim requirements are consistent with specific guidelines of the State. The State legislature stipulates minimum requirements, but also may allow the health plan to modify, add, or remove clean-claim elements as outlined by the State, including attachments, to allow the health plan to specify processing procedures for submitting claims.

Prompt-payment timeframes are measured from the clean date of the claim. The clean date is the date when the requested information required for resolving the suspended line(s) is received, and the claims processing system of record is updated by removing the “non-clean” EX code to populate the clean date.

A claim will not be considered clean unless it contains all information provided in “Claim Form Field Requirements” listed in the State billing manual for paper claims and all information

according to the state specific companion guide for claims submitted via a HIPAA compliant 837I and 837P electronic claim. Claims for acute inpatient and other inpatient and outpatient facilities are to be submitted on the UB 04 or 837I, and claims for individual professional items and services are to be submitted on the CMS 1500, 837P, or through direct data entry via the Web.

Non-clean Claim

A Non-clean Claim is a claim submitted to the health plan that requires further investigation or development beyond the information contained on the claim submitted for adjudication. The errors or omissions on the claim may result in: a) a request for additional information from the provider or other external sources to resolve or correct data omissions or billing errors on the claim; b) the need for review of additional medical records; or c) the need for other information necessary to resolve plan benefit limitation issues and/or other discrepancies. In addition, a Non-clean Claim may require review for medical necessity or may not have been submitted within the applicable filing deadline.

Reimbursement

Upon receipt of a claim, the health plan will commence processing and will determine whether the claim constitutes a Clean Claim. The health plan will notify providers through a HIPAA-compliant electronic 835, or 997 remittance-advice transaction or in writing via an Explanation of Payment (EOP) when claims are submitted that do not meet the criteria defining a Clean Claim. The health plan will advise the provider what additional information is necessary for the health plan to continue to adjudicate the claim. Once the health plan receives the additional requested information, it will resume adjudication of the claim and will, as appropriate, advise the provider if additional information is necessary to complete processing of the claim, causing the claim to remain a Non-clean Claim. Upon the health plan notification to a facility that a claim constitutes a non-Clean Claim, the claim processing timeframe will be suspended and will not resume until the health plan receives the information requested in the Non-clean Claim notification, and determines that the claim may then be processed as a Clean Claim.

Utilization

Providers consistently submitting Non-clean Claims may be contacted for provider education.

Documentation Requirements

Claims must be HIPAA compliant and submitted electronically or by using CMS 1450 (UB 04) or CMS 1500 claim forms, as appropriate for the provider type making the claim.

Before a claim can be processed, it must be a "clean" (i.e., complete) claim submission, and must contain all required information and meet the conditions below:

- Primary carrier Explanation of Benefits (EOB), when Centene is the secondary payer;
- Standard ICD-9-CM/ICD-10-CM, ICD-10-PCS, CPT, HCPCS, and revenue codes, as appropriate;
- Does not require additional development for adjudication on its merits (i.e., requires no investigation or requires investigation by the Claims, Medical Review, or Payment

departments, but without the need to contact the provider, the member, other payer, or other outside source under the paper requirements or companion guide);

- Claims subject to medical review must contain complete and pertinent medical records that have been attached by the provider or forwarded in accordance with the health plan's instructions; and
- Has all basic information and supporting documentation the health plan determines is needed to adjudicate the claim resulting in a paid or denied status.

PA Health & Wellness will remit claims that do not meet the minimum requirements as either a 997 rejection, rejection letter, or a denied remittance code (EX code), with the denied reason on either the rejection notice or the remittance code.

For more information on State claims processing procedures, refer to the State billing manual to validate the claim-form requirements.

Additional Information

Except as noted, the health plan may require clinical documentation at the time a claim is submitted for the following categories of claims to be considered complete:

- Codes appended with a modifier indicating additional or unusual services (e.g., 22, 23, 53, or 66);
 - Exception: The following modifiers do not require clinical records:
 - Any HCPCS Level II modifiers;
 - CPT modifiers 24, 25, 26, 52, 59, 63, or 90;
- Codes to which an assistant or co-surgeon modifier is attached that do not normally require assistant or co-surgeons;
- Any code listed in the "Unlisted Services and Procedures" section of the CPT Manual Index.
- A diagnosis code defined as "not otherwise specified" (NOS);
- A diagnosis code defined as "not elsewhere classified" (NEC);
- Procedures that are potentially cosmetic;
- Pharmaceuticals (including, but not limited to, pharmaceuticals used outside of the scope of their FDA-approved uses) and procedures that may be experimental or investigational;
- Procedures that are medically necessary for some indications and not for others; and
- Services performed in an unexpected place of service, such as office services performed in an outpatient surgery center.

In addition, the health plan may require submission of clinical records before or after payment of a claim for the purpose of investigating potentially fraudulent, wasteful, abusive, or other inappropriate billing practices, but only as long as the health plan determines it has reasonable basis for believing such investigation is warranted.

Types of clinical documentation that may be requested include:

- Emergency Department records
- Facility records
- Anesthesia notes with times
- Operative summaries

- Radiology interpretation and reports
- Laboratory results
- Physician and/or non-physician practitioner office notes
- Any other pertinent medical records

Related Documents or Resources

Please consult the applicable State Medicaid billing manual for additional information.

References

1. *Current Procedural Terminology (CPT®)*, 2018

Revision History	
Pending	Notice Period
11/2016	Revised to include modifiers 24 and 59 in the exceptions, as HCI will determine if medical records are needed.
05/09/2017	Converted to new policy and conducted review.
06/09/2018	Conducted annual review, updated policy
09/01/2019	Conducted review and updated.
11/1/2019	New PHW policy created

Important Reminder

For the purposes of this payment policy, “Health Plan” means a health plan that has adopted this payment policy and that is operated or administered, in whole or in part, by PA Health & Wellness, or any other of such health plan’s affiliates, as applicable.

The purpose of this payment policy is to provide a guide to payment, which is a component of the guidelines used to assist in making coverage and payment determinations and administering benefits. It does not constitute a contract or guarantee regarding payment or results. Coverage and payment determinations and the administration of benefits are subject to all terms, conditions, exclusions and limitations of the coverage documents (e.g., evidence of coverage, certificate of coverage, policy, contract of insurance, etc.), as well as to state and federal requirements and applicable plan-level administrative policies and procedures.

This payment policy is effective as of the date determined by Health Plan. The date of posting may not be the effective date of this payment policy. This payment policy may be subject to applicable legal and regulatory requirements relating to provider notification. If there is a discrepancy between the effective date of this payment policy and any applicable legal or regulatory requirement, the requirements of law and regulation shall govern. Health Plan retains the right to change, amend or withdraw this payment policy, and additional payment policies may be developed and adopted as needed, at any time.

This payment policy does not constitute medical advice, medical treatment or medical care. It is not intended to dictate to providers how to practice medicine. Providers are expected to exercise professional medical judgment in providing the most appropriate care, and are solely responsible

for the medical advice and treatment of members. This payment policy is not intended to recommend treatment for members. Members should consult with their treating physician in connection with diagnosis and treatment decisions.

Providers referred to in this policy are independent contractors who exercise independent judgment and over whom Health Plan has no control or right of control. Providers are not agents or employees of Health Plan.

This payment policy is the property of PA Health & Wellness. Unauthorized copying, use, and distribution of this payment policy or any information contained herein are strictly prohibited. Providers, members and their representatives are bound to the terms and conditions expressed herein through the terms of their contracts. Where no such contract exists, providers, members and their representatives agree to be bound by such terms and conditions by providing services to members and/or submitting claims for payment for such services.

Note: For Medicaid members, when state Medicaid coverage provisions conflict with the coverage provisions in this payment policy, state Medicaid coverage provisions take precedence. Please refer to the state Medicaid manual for any coverage provisions pertaining to this payment policy.

Note: For Medicare members, to ensure consistency with the Medicare National Coverage Determinations (NCD) and Local Coverage Determinations (LCD), all applicable NCDs and LCDs should be reviewed prior to applying the criteria set forth in this payment policy. Refer to the CMS website at <http://www.cms.gov> for additional information.

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