

Calendar Year 2023 (CY23) Medicare Part C Improper Payment Measure (Part C IPM) Provider Source Reference Document



Medical records submitted for the Part C Improper Payment Measure (Part C IPM) sample must document a face-to-face visit with an acceptable risk adjustment provider.¹ Documentation from an unacceptable provider source has historically been one of the largest causes for records being deemed invalid for Part C IPM. The purpose of this document is to provide Medicare Advantage (MA) Organizations with examples of [valid](#) and [invalid](#) provider source visits to assist with selecting appropriate documentation for the sample. **Note:** These lists are not all-inclusive.

! Important Reminders

- Diagnostic Radiology is **not** a valid provider source for Part C IPM.
- For assistance with determining whether a particular physician specialty is an acceptable risk adjustment provider, refer to “Appendix A: CMS-HCCs and Physician Specialties” in the *Part C IPM Medical Record Submission Instructions*. Plan users who have access to the Health Plan Management System (HPMS) Part C IPM module can download the instructions from the Document Library. The instructions are also publicly available on the [CMS.gov Part C IPM website](#).
- The Centers for Medicare & Medicaid Services (CMS) recommends submitting records early in the submission window to take advantage of submission feedback and allow time to select and submit new records before the May 8, 2025 deadline, as needed.

Examples of Valid Provider Source Diagnostic Testing Visits With Acceptable Physician Interpretation (Outpatient Submissions Only)

This section lists examples of **valid provider source visits** by specialty, along with additional notes as applicable. These lists are not all-inclusive. **Note:** Submitting documentation from visits in this section does **not** guarantee a valid submission. CMS’ medical record reviewers must review the record in its entirety to determine validity.



Cardiology, Interventional Cardiology, and Vascular Surgery – VALID Sources

- Cardiac catheterization
- Echocardiogram
 - **Note:** Includes Doppler or Duplex, color flow of the **heart vessels**
- Electrocardiogram (EKG)
- Myocardial perfusion and other nuclear medicine imaging of the heart
- Pacemaker analysis (non-telephonic)
 - **Note:** Telephonic pacemaker analyses are invalid
- Percutaneous transluminal coronary angioplasty (PTCA) (or percutaneous coronary intervention [PCI]) – coronary angiography
- Stress test
- Vascular Doppler study interpretation (not by a Diagnostic Radiologist)
 - **Note:** This is valid only if it is **not** performed by a Diagnostic Radiologist. If it is performed by a Vascular Surgeon, it is valid.



Interventional Radiology - VALID Sources

- Catheter angiography – coronary computed tomography angiogram (CTA)
- Embolization procedures
- Endoscopic retrograde cholangiopancreatography (ERCP)
- Extracorporeal shock wave lithotripsy (ESWL)
- Fluoroscopic guidance
 - **Note:** Fluoroscopic guidance is often used for cardiac catheterization, catheter insertion and manipulation, placement of stents, orthopedic surgery, etc. When **not** used for guidance, fluoroscopy is only diagnostic and is not valid.
- Genitourinary vascular flow imaging (nuclear medicine)
- Magnetic resonance angiogram (MRA)
- Radiation therapy – ultrasound guidance
- Radiofrequency ablation

¹ As a result of the COVID-19 emergency declaration blanket waivers CMS has issued, telehealth visits for CY23 dates of service (January 1, 2022 – December 31 2022) will be considered equivalent to face-to-face visits. The documentation should reflect the same standard of care as an in-person visit.



Pulmonology - VALID Sources

- Pulmonary function tests (PFT)
- Pulmonary perfusion and ventilation imaging



Neurology - VALID Sources

- Electroencephalography (EEG)
- Electromyography (EMG)
- Nerve conduction studies
- Nuclear medicine brain imaging
- Sleep studies (polysomnography)



Pathology Reports *With Interpretation by a Pathologist* - VALID Sources

Note: All of these pathology reports **must** include an interpretation by a pathologist.

- Cell block report, cytopathology report of fluids/brushings
- Chromosome analysis
- Pathology from a tissue biopsy (lung biopsy, bone biopsy, etc.)
- Papanicolaou (pap) smear report

Examples of Invalid Provider Source Visits

This section lists examples of **invalid provider source visits** that would lead to an invalid submission for Part C IPM, along with applicable notes. These lists are not all-inclusive.



Diagnostic Tests – INVALID Sources

- Angiography (other than coronary)
- Arthrogram (joint x-ray)
- Barium enema (colon x-ray)
- Barium swallow (esophagogram)
- Bone scan
- Computed tomography (CT or CAT scan)
- Cystography
- Diagnostic fluoroscopy (imaging only, for diagnostic purposes)
 - **Note:** Fluoroscopic-guided procedures are valid (see valid diagnostic testing list for examples of fluoroscopic guidance).
- Diagnostic test results **without interpretation** (standalone report with technical component or nursing notes only)
 - **Note:** Diagnostic testing encounters are generally performed by technical staff not included on the list of acceptable physician/practitioner specialties. If there is no accompanying interpretation or consultation by a physician specialist, other than diagnostic radiology, the provider type is invalid.
- Diagnostic ultrasound
- Hysterosalpingogram
- Lab reports
- Magnetic Resonance Imaging (MRI)
- Mammogram
- Myelography



Diagnostic Tests – INVALID Sources Continued

- Pathology reports **without a pathologist interpretation** (lab test result only)
- Positron emission tomography (PET) scan
- Single photon emission computed tomography (SPECT)
- Thyroid scan
- Virtual colonoscopy/CT colonography (computed tomography)
 - **Note:** This is an alternative to a conventional colonoscopy (which is a valid procedure). It uses a series of x-rays to create a 3-dimensional image of the inside of the colon rather than requiring the insertion of a scope.
- X-rays



Clinical Laboratory Test Results – INVALID Sources

- Chemistry profile report
- Complete blood count (CBC) report/blood test results
- Hepatitis antigen/antibody test
- Pleural fluid analysis report
- Rheumatoid factor
- Urinalysis report
- Urine culture report
- Urine pregnancy test
- Wound culture report



Miscellaneous Invalid Provider Visits – INVALID Sources

- Nursing note only from a registered nurse (RN), licensed practical nurse (LPN), or other invalid nursing provider
- A signed note from an inpatient encounter by a physical therapist (PT)/ occupational therapist (OT)/ speech pathologist (SP)/ licensed clinical social worker (LCSW) that was submitted as an outpatient document type
- Dietitian note
- Swing Bed in a hospital
- Skilled nursing facility (SNF) stay submitted as an inpatient document type