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May 30, 2018

Patti Vaughn
Benefits Administration Manager
Idaho Industrial Commission
700 S. Clearwater Lane, PO Box 83720
Boise, Idaho 83720

Re: Idaho Commercial Reimbursement Benchmarking

Dear Patti:

At the request of the Idaho Industrial Commission (IIC), Milliman is pleased to provide this report on commercial reimbursement in Idaho for specific DRGs and HCPCS. This analysis provides average commercial allowed amounts, those amounts as a percentage of Medicare, and percentiles of those allowed amounts. A similar analysis was provided on May 15th, 2017 with a slightly different set of codes and breakouts. We understand that you will use this information to assess commercial reimbursement levels in the State of Idaho. This analysis may not be appropriate for other purposes.

This analysis is subject to the terms and conditions of the Contract for Actuarial Services between Milliman and the Idaho Industrial Commission dated May 10th, 2018.

Results

All requested tables of information are being provided in the attached exhibits. For your reference, the following table summarizes the average percent of Medicare in the data for each table using the HCPCS/DRG distribution in the data:

**Table 1
Summary of 2017 Commercial Average Allowed
As a Percentage of 2017 Medicare**

Description	Percent of Medicare
Inpatient DRG	242%
Outpatient Surgery*	150%
Outpatient Non-Surgery*	303%
Physician Surgery	207%
Physician Radiology	239%
Physician Medicine	130%
Physician Evaluation and Management	166%

*Outpatient excludes additional bundled implant dollars

We have attached more detailed exhibits by HCPCS/DRG with average commercial payment amounts, those amounts as a percentage of 2016 Medicare, and the 10th, 25th, 50th, 75th, and 90th percentile of the commercial payment amounts. For the HCPCS in the Table 9 list you provided us, we provide results separately by place of service. This is because of notably higher average reimbursement (around 50% higher) when performed at a non-facility location compared to a facility location.

Breaking out dollars for implants was a new request for the analysis this year and it was greatly limited by the availability of allowed amounts by implant. Often an implant was performed on a claim but the allowed amount was at the claim level and not available for the implant. For the inpatient exhibit, we have provided the percent of dollars that are listed in claim lines that have implant revenue codes for each DRG. We also included the number of claims that had implant revenue codes and the portion of those where the allowed dollars were greater than \$0. For the outpatient exhibit, we determined the additional implant dollars that are bundled to the given HCPCS. The exhibits we have provided are:

- ∅ Exhibit 1: Average Inpatient Commercial Charge, Percentage of Medicare and Percentiles by DRG
 - Includes requested Inpatient DRGs
 - New this year, we show the percent of dollars that are on an implant revenue code.
- ∅ Exhibit 2: Average Outpatient Commercial Charge, Percentage of Medicare and Percentiles by HCPCS
 - Includes requested Outpatient HCPCS
 - New this year, we show the average amount of implant dollars that are bundled into each HCPCS, and a separate percentage of Medicare for the combined allowed plus added implant dollars.
- ∅ Exhibit 3: Average Professional Commercial Charge, Percentage of Medicare and Percentiles by HCPCS
 - Includes requested Physician surgery, radiology, and physical medicine HCPCS
- ∅ Exhibit 4: Average Professional Commercial Charge, Percentage of Medicare and Percentiles by HCPCS and Place of Service
 - Includes requested Physician evaluation and management HCPCS

A few observations from the exhibits:

- ∅ The results are generally similar to the deliverable provided on 5/1/2017.
- ∅ The outpatient HCPCS that have very low percentages of Medicare generally have large amounts of implants bundled to them. If you include the bundled amount, the percent of Medicare is much more reasonable. For example, HCPCS 63685 is 41% of Medicare but increases to 141% of Medicare once implants are included.
- ∅ The range of amounts paid by commercial payers for specific DRG/HCPCS is relatively large. The ratio between the 10th percentile and 90th percentile is generally around 250%-300% for inpatient and outpatient services. Physician professional services tend to be lower at around 150%-200%.
- ∅ The average allowed is between the 25th percentile and the 75th percentile in most cases. A few HCPCS have an average allowed outside of the range due to a few outlier claims. Most of these are physician surgery and radiology HCPCS.

Methodology

Commercial reimbursement was calculated using the 2016 MarketScan commercial claim data for Idaho members. The MarketScan database (produced by Truven) covers tens of millions of lives across the United States. Average allowed and allowed percentiles were calculated for the DRG/HCPCS codes requested by the IIC.

The following adjustments were made to the MarketScan repricing:

- ∅ The exhibits use fiscal year 2016 Medicare allowed. A single year of trend was applied to put the 2016 MarketScan data on a 2017 basis. The 2016 to 2017 commercial allowed trends are listed below:
 - Inpatient: 4.0%
 - Outpatient: 4.4%
 - Professional: 2.4%
- ∅ MarketScan does not provide billed amounts, making it difficult to distribute allowed dollars when a claim is paid as a case payment. Due to this, we have excluded claims with case payments.
- ∅ Certain HCPCS have very few claims without a modifier. To increase the credibility of the percentiles, Milliman reviewed all modifiers in the data set and kept claims with high frequency modifiers that do not greatly alter the average paid amount. Claim lines with the following modifiers were kept. All other claim lines with modifiers were excluded:
 - Outpatient: 25, TC, GP, LT, RT, GO, 59, F1-F9, FA
 - Physician: 25, GP, LT, RT, AT, GO, 59, F1-F9, FA
- ∅ Services with specialties indicating that they were performed by assistants have been excluded. The specialty codes for these are 32, 43, 97, and Z0.
- ∅ For HCPCS that should rarely or never have more than one unit, claim lines with multiple units were excluded. Unit-dependent HCPCS are shown in the exhibit on a 'per unit' basis. All HCPCS we identified as unit-dependent had two or more units on at least 21% of claim lines. All other HCPCS had multiple units on less than 5% of claim lines. The following HCPCS are unit-dependent:
 - Outpatient: 97110, 97112, 97140, 97530, and J0696
 - Professional: 97110, 97112, 97140, and 97530
- ∅ As requested, ambulatory surgical centers are excluded in the calculations. We are unable to exclude critical access hospitals because they are not identifiable in the MarketScan data.

MarketScan is comprised of multiple contributors. Certain service categories are excluded for some contributors based on a review of the contributor coding by service category. Examples include:

- ∅ Inpatient claims for MarketScan contributors where the ICD coding was not complete enough for DRG assignment.
- ∅ Professional results for a subset of MarketScan contributors where HCPCS and Modifier were not reliably populated.

Implant carveout logic:

- ∅ Claim lines are identified as implants using revenue codes 0274, 0275, 0276, and 0278.
- ∅ For inpatient, the implant dollars are already included in the DRG average. For outpatient, we show separate calculations with and without implant dollars. The values in the prior deliverable from 5/1/2017 show values that exclude implant dollars.

- ∅ To determine the outpatient implant dollars for each claim line, all implant commercial allowed dollars that are bundled by Medicare are assigned to the APC payment on the claim. The APC allowed dollar distribution is used to spread the implant dollars across claims where there are multiple claim lines with Medicare payments.

Medicare Amounts

The MarketScan data was repriced to 2017 Medicare allowed levels using the *Milliman Medicare Repricer*. The following considerations apply to the repricing results:

- ∅ All repriced amounts reflect prospective amounts and do not reflect any settlements with CMS.
- ∅ No adjustments are made for sequestration.
- ∅ Repriced amounts are based on information released at the beginning of each year (Federal fiscal year for inpatient and calendar year for other types of services).
- ∅ No adjustment is made for providers that participate in Medicare's Bundled Payment for Care Improvement (BPCI) initiative.

Facility Repricing

- ∅ Medicare facility payments are provider-specific; however MarketScan does not include provider information. We used Medicare FFS data to estimate the provider mix in each member area.
- ∅ Inpatient Medicare payments exclude Indirect Medical Education (IME), Disproportional Share (DSH), Uncompensated Care, and outlier payment components.
- ∅ Non-PPS hospitals are priced using PPS. This includes:
 - Critical access hospitals (paid at cost by Medicare)
 - Cancer and children's hospitals (paid at cost by Medicare)
- ∅ Inpatient new technology payments are not included. The impact of these payments varies from year to year, but is generally is very small (i.e. less than 1%).
- ∅ Inpatient rehabilitation and psychiatric hospital claims are priced using IPPS rather than the Rehab PPS and Psych PPS schedules.

Professional Repricing

- ∅ Medicare employs claim edits to deny payment for certain professional services. We assumed all professional services with a positive allowed amount were accepted for payment and included these services in the repricing analysis.
- ∅ No physician incentive payment adjustments are included, such as those under the Electronic Prescribing (eRx) Incentive Program, the Physician Quality Reporting System (PQRS), the Maintenance of Certification Program (MOC), or the Primary Care Incentive Payments (PCIP) program.
- ∅ Medicare makes additional payments for professionals in Health Professional Shortage Areas. These payments are not incorporated.

Data Reliance and Variability of Results

This report is not intended to benefit third parties. Regarding the contents of this report, Milliman makes no representations or warranties to third parties. Third parties are to place no reliance upon this report that would result in the creation of any duty or liability for Milliman or its employees to third parties, under any theory of law. Third parties receiving this report must rely on their own experts to draw conclusions about the report's contents.

In performing our analysis, we relied on data and other information provided to us by CMS and Truven Health MarketScan®. We have not audited or verified this data and other information, but we have reviewed it for reasonableness. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete.

Our estimates are not predictions of the future; they are estimates based on the assumptions. If the underlying data or other listings are inaccurate or incomplete, this analysis may also be inaccurate or incomplete. Emerging results should be carefully monitored with assumptions adjusted as appropriate.

We performed a limited review of the data used directly in our analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of our assignment.

Please call us with any questions or concerns. We appreciate the opportunity to work with you on this review.

Sincerely,

A handwritten signature in black ink, appearing to read "David C. Lewis". The signature is fluid and cursive, with the first name "David" being the most prominent.

David C. Lewis
Senior Consultant

Attachments

Exhibit 1
Idaho Industrial Commission
Average Inpatient Commercial Charge, Percentage of Medicare and Percentiles by DRG

Notes on Implant Amounts
 Inpatient allowed amounts by implant code were often not populated because the implant payment was bundled with the rest of the claim.
 Amounts are shown to the right for claims where implants had separate allowed amounts, and where they did not.

DRG	Description	Admits	Average		Percentiles of MarketScan Allowed				
			2017	%-age of	10th	25th	50th	75th	90th
			Marketscan Allowed ⁽¹⁾	2017 Medicare ⁽²⁾					
460	Spinal fusion except cervical w/o MCC	275	\$51,907	221%	\$29,415	\$34,505	\$47,241	\$62,128	\$84,827
464	Wnd debrid & skn grft exc hand, for musculo-conn tiss dis w CC	26	\$37,953	222%	\$18,075	\$25,493	\$32,430	\$49,070	\$64,558
468	Revision of hip or knee replacement w/o CC/MCC	52	\$37,123	225%	\$20,676	\$29,759	\$34,808	\$43,822	\$54,195
470	Major joint replacement or reattachment of lower extremity w/o MCC	1,297	\$30,976	254%	\$17,120	\$23,163	\$30,213	\$40,082	\$43,822
472	Cervical spinal fusion w CC	81	\$32,532	197%	\$15,961	\$22,349	\$31,130	\$43,133	\$54,944
473	Cervical spinal fusion w/o CC/MCC	179	\$27,626	207%	\$15,349	\$18,367	\$23,840	\$37,536	\$45,153
481	Hip & femur procedures except major joint w CC	24	\$33,330	280%	\$17,151	\$22,180	\$34,959	\$38,919	\$42,020
482	Hip & femur procedures except major joint w/o CC/MCC	36	\$23,135	224%	\$12,120	\$18,067	\$21,689	\$27,138	\$32,027
483	Major Joint/Limb Reattachment Procedure Of Upper Extremities	82	\$28,143	192%	\$16,356	\$17,823	\$25,681	\$36,354	\$43,815
493	Lower extrem & humer proc except hip,foot,femur w CC	39	\$27,598	219%	\$13,893	\$21,194	\$27,395	\$31,399	\$37,326
494	Lower extrem & humer proc except hip,foot,femur w/o CC/MCC	52	\$22,577	235%	\$16,104	\$18,254	\$21,506	\$27,395	\$29,302
518	Back & Neck Proc Exc Spinal Fusion W Mcc Or Disc Device/Neurostim	9	\$19,227	117%	\$14,147	\$14,147	\$14,147	\$26,485	\$31,812
520	Back & Neck Proc Exc Spinal Fusion W/O Cc/Mcc	28	\$18,810	254%	\$7,754	\$11,282	\$16,440	\$21,555	\$35,854
552	Medical back problems w/o MCC	14	\$19,337	381%	\$7,067	\$11,294	\$12,700	\$16,921	\$34,570
560	Aftercare, musculoskeletal system & connective tissue w CC	8	\$17,834	282%	\$8,788	\$12,509	\$18,664	\$23,655	\$24,225
561	Aftercare, musculoskeletal system & connective tissue w/o CC/MCC	1	\$30,028	679%	\$30,028	\$30,028	\$30,028	\$30,028	\$30,028
563	Fx, sprn, strn & disl except femur, hip, pelvis & thigh w/o MCC	8	\$20,846	456%	\$8,042	\$8,989	\$11,158	\$19,940	\$78,554
603	Cellulitis w/o MCC	58	\$11,669	235%	\$6,074	\$8,715	\$12,492	\$13,875	\$14,121
871	Septicemia or severe sepsis w/o MV 96+ hours w MCC	253	\$27,650	265%	\$9,988	\$12,973	\$28,150	\$38,269	\$39,274
872	Septicemia or severe sepsis w/o MV 96+ hours w/o MCC	198	\$19,853	327%	\$7,238	\$13,493	\$17,696	\$18,260	\$29,476
909	Other O.R. procedures for injuries w/o CC/MCC	8	\$23,400	298%	\$12,971	\$14,566	\$18,476	\$20,953	\$66,240
945	Rehabilitation w CC/MCC	7	\$23,826	336%	\$15,697	\$19,690	\$22,840	\$24,991	\$37,542
964	Other multiple significant trauma w CC	12	\$17,511	210%	\$8,383	\$13,915	\$17,042	\$22,991	\$23,181

(1) Based on 2016 MarketScan data trended to 2017.
 (2) Medicare amount excludes DSH, IME, UCP, and Outlier add-on payments.

Implant Information					
Admits w/ an Implant (Rev Codes 0274-0276, 0278)		Admits with non-Zero Allowed \$s by Implant Code		Admits with Zero Allowed \$s by Implant Code	
Number	% of Total	Admits	Implant % of Total Allowed	Admits	Implant % of Total Allowed
273	99%	32	41.2%	241	
20	77%	1	25.2%	19	
52	100%	3	51.8%	49	
1,275	98%	161	38.6%	1,114	
80	99%	10	25.9%	70	
179	100%	28	27.5%	151	
23	96%	4	18.7%	19	
31	86%	3	16.0%	28	Cannot be
81	99%	12	54.5%	69	determined.
36	92%	2	24.1%	34	
47	90%	9	21.6%	38	
9	100%	0		9	
8	29%	6	23.1%	2	
4	29%	0		4	
3	38%	1	0.6%	2	
0	0%	0		0	
0	0%	0		0	
2	3%	0		2	
22	9%	3	1.9%	19	
19	10%	0		19	
4	50%	2	44.4%	2	
1	14%	0		1	
0	0%	0		0	

Exhibit 2

**Idaho Industrial Commission
Average Outpatient Commercial Charge, Percentage of Medicare and Percentiles by HCPCS
Excludes Modified Codes⁽²⁾**

Notes on Implant Amounts

Implants are coded separate from the HCPCS codes listed below. When implants occurred on a claim, their allowed amounts were spread across claim lines that were paid under APCs.

Source	HCPCS	Description	Units	Average		Percentiles of MarketScan Allowed					APC Code ⁽⁴⁾	Implant	
				2017 MarketScan Allowed ⁽¹⁾	%-age of 2017 Medicare ⁽³⁾	10th	25th	50th	75th	90th		Additional Bundled Implants ⁽⁵⁾	Combined % of 2017 Medicare ⁽⁶⁾
Surg	12001	Rpr s/n/ax/gen/trnk 2.5cm/<	710	\$206	2181%	\$111	\$141	\$215	\$259	\$287	5051	\$0	2181%
Surg	12002	Rpr s/n/ax/gen/trnk2.6-7.5cm	396	\$209	6388%	\$107	\$140	\$212	\$259	\$296	5051	\$0	6388%
Surg	20680	Removal of support implant	248	\$2,835	171%	\$1,629	\$1,892	\$2,705	\$3,656	\$4,454	5073	\$93	176%
Surg	22551	Neck spine fuse&remov bel c2	32	\$8,140	89%	\$1,710	\$5,941	\$6,017	\$9,630	\$14,633	5115	\$4,637	140%
Surg	23120	Partial removal collar bone	29	\$3,581	328%	\$2,366	\$2,617	\$3,709	\$3,966	\$5,116	5113	\$361	361%
Surg	23410	Repair rotator cuff acute	22	\$4,688	94%	\$2,280	\$3,999	\$4,526	\$5,599	\$7,508	5114	\$1,511	125%
Surg	23412	Repair rotator cuff chronic	44	\$4,631	94%	\$2,871	\$3,999	\$3,999	\$5,509	\$6,900	5114	\$1,229	119%
Surg	23430	Repair biceps tendon	67	\$4,736	103%	\$1,678	\$3,603	\$3,853	\$6,900	\$7,508	5114	\$774	120%
Surg	23515	Treat clavicle fracture	77	\$7,715	155%	\$4,394	\$5,309	\$7,963	\$10,133	\$10,721	5114	\$3,016	215%
Surg	24342	Repair of ruptured tendon	41	\$4,787	96%	\$3,461	\$3,461	\$3,853	\$5,973	\$7,508	5114	\$1,209	120%
Surg	25608	Treat fx rad intra-articul	27	\$6,743	135%	\$3,542	\$5,258	\$6,224	\$8,447	\$10,616	5114	\$2,755	190%
Surg	25609	Treat fx radial 3+ frag	33	\$6,849	138%	\$4,060	\$4,060	\$5,557	\$9,634	\$10,208	5114	\$3,819	215%
Surg	26055	Incise finger tendon sheath	126	\$1,998	205%	\$778	\$1,476	\$1,984	\$2,723	\$2,723	5112	\$1	206%
Surg	26615	Treat metacarpal fracture	28	\$5,173	216%	\$3,685	\$3,760	\$5,543	\$6,399	\$7,637	5113	\$1,220	267%
Surg	26765	Treat finger fracture each	12	\$3,386	145%	\$2,345	\$3,016	\$3,213	\$3,749	\$4,806	5113	\$22	146%
Surg	26951	Amputation of finger/thumb	10	\$2,004	87%	\$569	\$1,552	\$2,039	\$2,564	\$3,200	5113	\$0	87%
Surg	27792	Treatment of ankle fracture	58	\$5,350	111%	\$3,685	\$3,685	\$5,362	\$6,315	\$7,637	5114	\$2,019	153%
Surg	27814	Treatment of ankle fracture	32	\$6,862	131%	\$3,382	\$4,681	\$7,001	\$8,928	\$8,928	5114	\$2,570	180%
Surg	27829	Treat lower leg joint	39	\$4,761	372%	\$2,389	\$3,685	\$3,685	\$6,262	\$7,798	5114	\$1,859	518%
Surg	29806	Shoulder arthroscopy/surgery	151	\$5,584	131%	\$4,097	\$4,097	\$5,951	\$6,094	\$7,686	5114	\$1,181	158%
Surg	29807	Shoulder arthroscopy/surgery	105	\$5,486	132%	\$3,008	\$4,646	\$5,731	\$5,731	\$6,319	5114	\$1,066	158%
Surg	29822	Shoulder arthroscopy/surgery	64	\$3,679	241%	\$1,899	\$2,580	\$3,565	\$4,239	\$4,646	5113	\$243	257%
Surg	29823	Shoulder arthroscopy/surgery	109	\$4,654	485%	\$2,440	\$3,348	\$4,097	\$6,130	\$7,686	5113	\$204	506%
Surg	29824	Shoulder arthroscopy/surgery	110	\$3,399	251%	\$1,852	\$2,080	\$2,951	\$4,239	\$4,755	5113	\$237	269%
Surg	29826	Shoulder arthroscopy/surgery	191	\$4,512		\$2,170	\$3,235	\$4,097	\$5,420	\$7,686		\$528	
Surg	29827	Arthroscop rotator cuff repr	230	\$4,639	123%	\$1,902	\$3,399	\$4,449	\$5,528	\$6,965	5114	\$1,058	151%
Surg	29828	Arthroscopy biceps tenodesis	63	\$6,180	533%	\$3,008	\$5,224	\$6,094	\$6,319	\$7,686	5114	\$909	612%
Surg	29846	Wrist arthroscopy/surgery	18	\$3,106	239%	\$847	\$2,580	\$3,494	\$4,239	\$4,385	5113	\$252	258%
Surg	29873	Knee arthroscopy/surgery	61	\$2,897	134%	\$2,228	\$2,580	\$2,580	\$3,113	\$3,539	5113	\$44	136%
Surg	29877	Knee arthroscopy/surgery	61	\$3,447	159%	\$1,714	\$2,580	\$3,341	\$4,719	\$4,814	5113	\$88	163%
Surg	29880	Knee arthroscopy/surgery	226	\$3,600	170%	\$2,227	\$3,283	\$3,735	\$3,735	\$4,681	5113	\$122	176%
Surg	29881	Knee arthroscopy/surgery	552	\$3,341	171%	\$2,077	\$2,580	\$3,450	\$4,037	\$4,755	5113	\$184	180%
Surg	29888	Knee arthroscopy/surgery	318	\$6,357	124%	\$3,795	\$4,715	\$6,416	\$7,407	\$9,548	5114	\$2,544	173%
Surg	49505	Prp i/hern init reduc >5 yr	209	\$4,042	151%	\$2,007	\$2,750	\$3,956	\$5,485	\$5,485	5341	\$460	168%
Surg	49585	Rpr umbil hern reduc > 5 yr	158	\$4,119	168%	\$1,663	\$2,417	\$3,677	\$6,029	\$6,412	5341	\$526	190%
Surg	49587	Rpr umbil hern block > 5 yr	60	\$4,223	159%	\$1,987	\$3,348	\$4,661	\$5,485	\$5,485	5341	\$589	182%

Exhibit 2

Idaho Industrial Commission

Average Outpatient Commercial Charge, Percentage of Medicare and Percentiles by HCPCS

Excludes Modified Codes⁽²⁾

Notes on Implant Amounts

Implants are coded separate from the HCPCS codes listed below. When implants occurred on a claim, their allowed amounts were spread across claim lines that were paid under APCs.

Source	HCPCS	Description	Units	Average		Percentiles of MarketScan Allowed					APC Code ⁽⁴⁾	Implant	
				2017 MarketScan Allowed ⁽¹⁾	%-age of 2017 Medicare ⁽³⁾	10th	25th	50th	75th	90th		Additional Bundled Implants ⁽⁵⁾	Combined % of 2017 Medicare ⁽⁶⁾
Surg	49650	Lap ing hernia repair init	118	\$5,453	136%	\$2,230	\$2,968	\$5,036	\$7,934	\$7,934	5361	\$565	150%
Surg	49652	Lap vent/abd hernia repair	43	\$8,279	252%	\$3,655	\$5,274	\$9,107	\$11,789	\$11,789	5361	\$963	282%
Surg	62310	Inject spine cerv/thoracic	344	\$781	162%	\$401	\$611	\$611	\$996	\$1,259		\$0	162%
Surg	62311	Inject spine lumbar/sacral	566	\$830	175%	\$259	\$611	\$611	\$1,259	\$1,445		\$2	176%
Surg	62362	Implant spine infusion pump	6	\$6,582	44%	\$356	\$356	\$928	\$3,875	\$33,051	5471	\$10,777	116%
Surg	63030	Low back disk surgery	210	\$6,555	134%	\$4,193	\$4,193	\$5,875	\$8,067	\$10,000	5114	\$34	134%
Surg	63042	Laminotomy single lumbar	30	\$6,767	136%	\$4,193	\$4,193	\$6,448	\$8,106	\$9,952	5114	\$65	137%
Surg	63047	Remove spine lamina 1 lmbr	74	\$6,450	135%	\$4,193	\$4,193	\$6,181	\$8,106	\$9,952	5114	\$102	138%
Surg	63685	Insrt/redo spine n generator	34	\$10,602	41%	\$2,934	\$3,749	\$4,111	\$21,585	\$24,587	5464	\$25,832	141%
Surg	64415	N block inj brachial plexus	94	\$977	1839%	\$180	\$438	\$1,297	\$1,297	\$1,328	5443	\$243	2296%
Surg	64483	Inj foramen epidural l/s	590	\$884	146%	\$559	\$653	\$660	\$1,259	\$1,259	5443	\$0	146%
Surg	64721	Carpal tunnel surgery	265	\$2,184	164%	\$1,326	\$1,618	\$1,888	\$2,901	\$3,173	5431	\$31	166%
Surg	64831	Repair of digit nerve	12	\$3,350	84%	\$1,874	\$2,489	\$3,197	\$4,444	\$4,444	5432	\$1	84%
Non-Surg	36415	Routine venipuncture	101,986	\$11	591%	\$5	\$7	\$9	\$12	\$20		\$0	593%
Non-Surg	70450	Ct head/brain w/o dye	3,300	\$630	528%	\$334	\$471	\$614	\$650	\$997	5522	\$0	528%
Non-Surg	72125	Ct neck spine w/o dye	877	\$701	1801%	\$412	\$451	\$631	\$697	\$1,232	5522	\$1	1802%
Non-Surg	72141	Mri neck spine w/o dye	1,281	\$1,053	440%	\$721	\$883	\$1,060	\$1,181	\$1,588	5523	\$0	440%
Non-Surg	72148	Mri lumbar spine w/o dye	2,284	\$1,060	524%	\$715	\$883	\$1,060	\$1,181	\$1,588	5523	\$0	524%
Non-Surg	73030	X-ray exam of shoulder	2,575	\$137	411%	\$78	\$105	\$109	\$168	\$216	5521	\$12	448%
Non-Surg	73221	Mri joint upr extrem w/o dye	1,129	\$1,032	488%	\$546	\$883	\$1,030	\$1,181	\$1,574	5523	\$0	488%
Non-Surg	73222	Mri joint upr extrem w/dye	759	\$1,183	189%	\$758	\$760	\$997	\$1,466	\$1,742	5573	\$0	189%
Non-Surg	73721	Mri jnt of lwr extre w/o dye	3,057	\$994	469%	\$546	\$883	\$1,007	\$1,151	\$1,316	5523	\$1	469%
Non-Surg	74177	Ct abd & pelv w/contrast	6,204	\$1,563	774%	\$832	\$1,115	\$1,418	\$1,901	\$2,119	5571	\$0	774%
Non-Surg	81025	Urine pregnancy test	7,178	\$24	3995%	\$15	\$16	\$25	\$26	\$35		\$1	4106%
Non-Surg	84703	Chorionic gonadotropin assay	3,341	\$33	2618%	\$16	\$20	\$30	\$37	\$51		\$1	2677%
Non-Surg	87491	Chylmd trach dna amp probe	3,861	\$94	197%	\$63	\$83	\$91	\$101	\$138		\$0	197%
Non-Surg	87591	N.gonorrhoeae dna amp prob	3,712	\$97	202%	\$60	\$83	\$93	\$101	\$138		\$0	202%
Non-Surg	96365	Ther/proph/diag iv inf init	6,886	\$296	216%	\$147	\$147	\$261	\$390	\$521	5693	\$2	217%
Non-Surg	97110	Therapeutic exercises	70,050	\$54	271%	\$45	\$46	\$51	\$59	\$66		\$0	271%
Non-Surg	97112	Neuromuscular reeducation	9,304	\$55	240%	\$44	\$50	\$53	\$60	\$73		\$0	240%
Non-Surg	97140	Manual therapy 1/> regions	28,666	\$52	290%	\$42	\$46	\$48	\$55	\$66		\$0	290%
Non-Surg	97530	Therapeutic activities	19,534	\$52	304%	\$34	\$46	\$53	\$56	\$71		\$0	304%
Non-Surg	99205	Office/outpatient visit new	60	\$239	235%	\$93	\$153	\$275	\$318	\$360		\$0	235%
Non-Surg	99213	Office/outpatient visit est	2,208	\$108	106%	\$25	\$51	\$112	\$137	\$161		\$0	106%
Non-Surg	99214	Office/outpatient visit est	1,848	\$156	153%	\$57	\$108	\$153	\$184	\$227		\$0	153%
Non-Surg	99281	Emergency dept visit	2,652	\$148	263%	\$92	\$121	\$152	\$184	\$211	5021	\$0	263%

Exhibit 2

Idaho Industrial Commission

Average Outpatient Commercial Charge, Percentage of Medicare and Percentiles by HCPCS

Excludes Modified Codes⁽²⁾

Notes on Implant Amounts

Implants are coded separate from the HCPCS codes listed below. When implants occurred on a claim, their allowed amounts were spread across claim lines that were paid under APCs.

Source	HCPCS	Description	Units	Average		Percentiles of MarketScan Allowed					APC Code ⁽⁴⁾	Implant	
				2017 MarketScan Allowed ⁽¹⁾	%-age of 2017 Medicare ⁽³⁾	10th	25th	50th	75th	90th		Additional Bundled Implants ⁽⁵⁾	Combined % of 2017 Medicare ⁽⁶⁾
Non-Surg	99282	Emergency dept visit	8,794	\$282	273%	\$188	\$227	\$307	\$323	\$323	5022	\$0	273%
Non-Surg	99283	Emergency dept visit	14,950	\$471	242%	\$309	\$362	\$455	\$574	\$620	5023	\$0	242%
Non-Surg	99284	Emergency dept visit	15,109	\$775	237%	\$468	\$647	\$710	\$882	\$1,053	5024	\$0	238%
Non-Surg	99285	Emergency dept visit	5,925	\$1,182	218%	\$840	\$1,062	\$1,175	\$1,279	\$1,315	5025	\$2	219%
Non-Surg	J0696	Ceftriaxone sodium injection	7,719	\$9		\$1	\$2	\$5	\$15	\$28		\$0	

(1) Based on 2016 MarketScan data trended to 2017. Does not include additional bundled implant dollars.

(2) Only the following modifiers are included: 25, TC, GP, LT, RT, GO, 59, F1-F9, FA

(3) HCPCS 29826 and J0696 are bundled, so they do not have a percent of Medicare amount.

(4) A few HCPCS do not have APC codes because they are either bundled or paid using a different method than APC.

(5) Implants are defined as lines with revenue code 0274, 0275, 0276, or 0278.

(6) (MarketScan Allowed + Additional Bundled Implants) / 2017 Medicare

Exhibit 3

Idaho Industrial Commission

Average Professional Commercial Charge, Percentage of Medicare and Percentiles by HCPCS

Excludes Modified Codes⁽²⁾

Source	HCPCS	Description	Units	Average		Percentiles of MarketScan Allowed				
				2017 MarketScan Allowed ⁽¹⁾	%-age of 2017 Medicare	10th	25th	50th	75th	90th
Surgery	22551	Neck spine fuse&remov bel c2	240	\$3,253	211%	\$2,538	\$3,203	\$3,340	\$3,422	\$3,422
Surgery	22633	Lumbar spine fusion combined	149	\$3,519	205%	\$2,117	\$3,250	\$3,630	\$3,719	\$3,719
Surgery	23430	Repair biceps tendon	78	\$1,387	210%	\$729	\$1,413	\$1,472	\$1,692	\$1,693
Surgery	27447	Total knee arthroplasty	782	\$2,563	202%	\$2,096	\$2,555	\$2,686	\$2,689	\$2,719
Surgery	29807	Shoulder arthroscopy/surgery	110	\$2,048	216%	\$1,837	\$2,045	\$2,052	\$2,073	\$2,360
Surgery	29823	Shoulder arthroscopy/surgery	56	\$1,043	216%	\$212	\$898	\$1,224	\$1,244	\$1,415
Surgery	29824	Shoulder arthroscopy/surgery	159	\$1,311	216%	\$927	\$1,293	\$1,328	\$1,451	\$1,535
Surgery	29826	Shoulder arthroscopy/surgery	675	\$358	214%	\$327	\$348	\$348	\$352	\$400
Surgery	29827	Arthroscop rotator cuff repr	396	\$2,053	207%	\$1,822	\$2,053	\$2,109	\$2,109	\$2,411
Surgery	29828	Arthroscopy biceps tenodesis	34	\$1,614	213%	\$614	\$1,572	\$1,723	\$1,823	\$1,939
Surgery	29881	Knee arthroscopy/surgery	427	\$1,053	214%	\$926	\$1,045	\$1,072	\$1,079	\$1,227
Surgery	29888	Knee arthroscopy/surgery	339	\$1,900	206%	\$1,687	\$1,875	\$1,947	\$1,953	\$1,974
Surgery	63030	Low back disk surgery	174	\$1,833	204%	\$1,692	\$1,841	\$1,891	\$1,937	\$1,937
Radiology	70450	Ct head/brain w/o dye	110	\$306	285%	\$235	\$284	\$284	\$297	\$355
Radiology	72141	Mri neck spine w/o dye	714	\$521	258%	\$396	\$416	\$546	\$546	\$571
Radiology	72148	Mri lumbar spine w/o dye	1,326	\$515	253%	\$394	\$415	\$544	\$544	\$568
Radiology	72158	Mri lumbar spine w/o & w/dye	296	\$855	248%	\$670	\$705	\$876	\$922	\$966
Radiology	73030	X-ray exam of shoulder	3,806	\$51	188%	\$38	\$51	\$51	\$53	\$53
Radiology	73221	Mri joint upr extrem w/o dye	571	\$511	233%	\$306	\$417	\$545	\$574	\$601
Radiology	73222	Mri joint upr extrem w/dye	338	\$850	244%	\$667	\$870	\$916	\$916	\$961
Radiology	73562	X-ray exam of knee 3	3,413	\$62	187%	\$60	\$63	\$63	\$63	\$63
Radiology	73721	Mri jnt of lwr extre w/o dye	1,373	\$524	239%	\$237	\$438	\$570	\$575	\$600
Radiology	74177	Ct abd & pelv w/contrast	287	\$794	273%	\$669	\$756	\$758	\$795	\$795
Phys. Med.	97001	Pt evaluation	15,950	\$86	119%	\$77	\$87	\$87	\$87	\$87
Phys. Med.	97014	Electric stimulation therapy	58,315	\$17	126%	\$14	\$15	\$18	\$18	\$18
Phys. Med.	97035	Ultrasound therapy	18,796	\$14	139%	\$12	\$14	\$14	\$15	\$15
Phys. Med.	97110	Therapeutic exercises	246,698	\$35	139%	\$31	\$34	\$37	\$37	\$37
Phys. Med.	97112	Neuromuscular reeducation	32,611	\$35	126%	\$31	\$34	\$39	\$39	\$39
Phys. Med.	97140	Manual therapy 1/> regions	152,312	\$33	140%	\$28	\$33	\$35	\$35	\$35
Phys. Med.	97530	Therapeutic activities	62,976	\$37	135%	\$31	\$33	\$40	\$40	\$40
Phys. Med.	97545	Work hardening	0							
Phys. Med.	98941	Chiropract manj 3-4 regions	178,742	\$39	116%	\$36	\$38	\$38	\$41	\$41
Phys. Med.	99199	Special service/proc/report	0							

(1) Based on 2016 MarketScan data trended to 2017.

(2) Only the following modifiers are included: 25, GP, LT, RT, AT, GO, 59, F1-F9, FA

Exhibit 4

Idaho Industrial Commission

Average Professional Commercial Charge, Percentage of Medicare and Percentiles by HCPCS and Place of Service

Excludes Modified Codes⁽²⁾

Evaluation and Management Codes

HCPCS	Description	Facility								Non-Facility							
		Units	Average		Percentiles of MarketScan Allowed					Units	Average		Percentiles of MarketScan Allowed				
			2017 Marketscan Allowed ⁽¹⁾	%-age of 2017 Medicare	10th	25th	50th	75th	90th		2017 Marketscan Allowed ⁽¹⁾	%-age of 2017 Medicare	10th	25th	50th	75th	90th
99202	Office/outpatient visit new	363	\$76	155%	\$50	\$66	\$76	\$83	\$89	48,161	\$114	161%	\$80	\$107	\$122	\$127	\$130
99203	Office/outpatient visit new	943	\$115	156%	\$73	\$85	\$117	\$132	\$135	76,723	\$165	162%	\$131	\$158	\$164	\$184	\$186
99204	Office/outpatient visit new	1,236	\$198	158%	\$124	\$171	\$210	\$225	\$229	37,166	\$253	163%	\$211	\$242	\$251	\$281	\$285
99212	Office/outpatient visit est	1,319	\$38	154%	\$25	\$33	\$39	\$41	\$45	61,646	\$66	162%	\$49	\$62	\$66	\$74	\$75
99213	Office/outpatient visit est	9,579	\$76	154%	\$49	\$66	\$78	\$89	\$89	446,681	\$115	167%	\$97	\$109	\$124	\$124	\$127
99214	Office/outpatient visit est	8,294	\$113	149%	\$72	\$78	\$120	\$136	\$138	233,569	\$170	167%	\$142	\$162	\$184	\$184	\$187
99283	Emergency dept visit	10,711	\$112	188%	\$91	\$95	\$108	\$108	\$114	Not Applicable to Non-Facility							
99284	Emergency dept visit	19,582	\$205	181%	\$173	\$181	\$205	\$205	\$209	Not Applicable to Non-Facility							
99455	Work related disability exam	HCPCS Have No/Very Little Utilization															
99456	Disability examination	HCPCS Have No/Very Little Utilization															

(1) Based on 2016 MarketScan data trended to 2017.

(2) Only the following modifiers are included: 25, GP, LT, RT, AT, GO, 59, F1-F9, FA