

Study Goal, Data & Methods

The goal of this study was to estimate the impact on California workers' compensation medical payments in 2005 had the Official Medical Fee Schedule (OMFS) reimbursements for Evaluation and Management (E&M) services been set at 2006 Medicare rates. The OMFS has over 100 CPT codes within the Evaluation and Management section. The analysis incorporated all of the 73 E&M CPT codes currently found in the ICIS database associated with the care of injured workers in California. Table One displays the 73 CPT codes used in the analysis.

Table One. Evaluation and Management Codes Included in the Study

| OMFS Billing Code | Associated Medicare Code | Procedure Description |
|--------------------------|---------------------------------|--|
| 99201 | 99201 | Office/outpt E/M new pt, PF Hx & exam, SF MDM |
| 99202 | 99202 | OV/outpt E/M new pt, exp PF Hx & exam, SF MDM |
| 99203 | 99203 | OV/outpt E/M new pt, detailed Hx & exam, low MDM |
| 99204 | 99204 | OV/outpt E/M new pt, compr Hx & exam, mod MDM |
| 99205 | 99205 | OV/outpt E/M new pt, compr Hx & exam, high MDM |
| 99211 | 99211 | OV/outpt E/M estab pt that may not require phys |
| 99212 | 99212 | Office/outpt E/M estab pt, PF Hx & exam, SF MDM |
| 99213 | 99213 | OV/outpt E/M estab pt, exp PF Hx & exam, low MDM |
| 99214 | 99214 | OV/outpt E/M estab pt, detailed Hx/exam, mod MDM |
| 99215 | 99215 | OV/outpt E/M estab pt, compreh Hx/exam, high MDM |
| 99217 | 99217 | Observation care discharge day management'obs care |
| 99218 | 99218 | Init obs care E/M, det/compr Hx/exam, SF/low MDM |
| 99219 | 99219 | Init obs care E/M, compr Hx & exam, mod MDM |
| 99220 | 99220 | Init obs care E/M, compr Hx & exam, high MDM |
| 99221 | 99221 | Init hosp care E/M, det/compr Hx/exam,SF/low MDM |
| 99222 | 99222 | Init hosp care E/M, compr Hx & exam, mod MDM |
| 99223 | 99223 | Init hosp care E/M, compr Hx & exam, high MDM |
| 99231 | 99231 | Subsq hosp care E/M, PF Hx & exam, SF/low MDM |
| 99232 | 99232 | Subsq hosp care E/M, exp PF Hx & exam, mod MDM |
| 99233 | 99233 | Subsq hosp care E/M, detail Hx & exam, high MDM |
| 99234 | 99234 | Obs/inpt care E/M, det/compr Hx/exam,SF/low MDM |
| 99238 | 99238 | Hosp discharge day management, 30 mins or less'hos |
| 99239 | 99239 | Hosp discharge day management; more than 30 mins'h |
| 99241 | 99241 | Office consult, PF Hx/exam, straightforward MDM |
| 99242 | 99242 | Office consult, expanded PF Hx & exam, SF MDM |
| 99243 | 99243 | Office consultation, detailed Hx & exam, low MDM |
| 99244 | 99244 | Office consult, comprehensive Hx & exam, mod MDM |
| 99245 | 99245 | Office consult, comprehensive Hx/exam, high MDM |
| 99251 | 99251 | Initial inpatient consult, PF Hx & exam, PF MDM |
| 99252 | 99252 | Init inpatient consult, exp PF Hx & exam, SF MDM |
| 99253 | 99253 | Initial inpt consult, detail Hx & exam, low MDM |
| 99254 | 99254 | Init inpatient consult, compr Hx & exam, mod MDM |
| 99255 | 99255 | Initial inpt consult, compr Hx & exam, high MDM |
| 99261 | 99231 | Follow-up inpt consult, PF Hx & exam, SF/low MDM |
| 99262 | 99232 | Follow-up inpt consult, exp PF Hx/exam, mod MDM |
| 99263 | 99233 | Follow-up inpt consult, detail Hx/exam, high MDM |

| OMFS Billing Code | Associated Medicare Code | Procedure Description |
|----------------------------------|---|--|
| 99272 | 99242 | Confirmatory consult, exp PF Hx & exam, SF MDM |
| 99273 | 99243 | Confirmatory consult, detail Hx & exam, low MDM |
| 99274 | 99244 | Confirmatory consult, compr Hx & exam, mod MDM |
| 99275 | 99245 | Confirmatory consult, compr Hx & exam, high MDM |
| 99281 | 99281 | Emergency dept visit E/M, PF Hx & exam, SF MDM |
| 99282 | 99282 | ED visit E/M, expanded PF history/exam, low MDM |
| 99283 | 99283 | ED visit E/M, expanded PR history/exam, mod MDM |
| 99284 | 99284 | ED visit E/M, detailed history & exam, mod MDM |
| 99285 | 99285 | ED visit E/M, compr history & exam, high MDM |
| 99291 | 99291 | Critical care, E/M of critical pt; 1 st 30-74 min'c |
| 99292 | 99292 | Critical care, E/M of critical pt; ea ADDL 30 |
| 99303 | 99318 | SNF assess E/M, compr Hx & exam, mod/high MDM |
| 99311 | 99307 | Subsq SNF care E/M, PF Hx & exam, SF/low MDM |
| 99312 | 99309 | Subsq SNF care E/M, exp PF Hx & exam, mod MDM |
| 99313 | 99310 | Subsq SNF care E/M, det Hx & exam, mod/high MDM |
| 99332 | 99336 | RH visit estab pt E/M, exp PF Hx & exam, mod MDM |
| 99341 | 99341 | Home visit new pt E/M, PF Hx & exam, SF MDM |
| 99342 | 99343 | Home visit new pt E/M, exp PF Hx & exam, low MDM |
| 99344 | 99344 | Home visit new pt E/M, compr Hx & exam, mod MDM |
| 99348 | 99348 | Home visit estab pt E/M, exp PF Hx/exam, low MDM |
| 99349 | 99349 | Home visit estab pt E/M, det Hx & exam, mod MDM |
| 99350 | 99350 | Home visit estab pt E/M, compr Hx/exam, mod MDM |
| 99351 | 99347 | Home visit estab pt E/M, PF Hx/ecam, SF/low MDM |
| 99352 | 99349 | Home visit estab pt E/M, exp PF Hx/exam, mod MDM |
| 99353 | 99350 | Home visit estab pt E/M, det Hx & exam, high MDM |
| 99354 | 99354 | Prolong phys svc in office/outpt setting; ea 15 min |
| 99355 | 99355 | Prolong phys svc office/outpt setting; ADDL 30 |
| 99356 | 99356 | Prolonged phys service inpt setting; 1 st hour'prol |
| 99357 | 99357 | Prolonged phys service inpt setting, ea ADDL 30 |
| 99358 | 99358 | Prolonged E/M service; ea 15 min |
| 99361 | 99361 | Medical conference by phys w team; approx 30 min'p |
| 99362 | 99362 | Medical conference by phys w team; approx 60 min'p |
| 99371 | 99371 | Telephone call by phys to patient; simple/brief'ph |
| 99372 | 99372 | Telephone call by phys to patient; intermediate'ph |
| 99373 | 99373 | Telephone call by phys to pt; complex/lengthy'phys |
| 99401 | 99401 | Prevent medicine counsel, indiv; approx 15 mins'in |
| 99499 | 99499 | Unlisted evaluation and management service'unliste |

The authors compiled a sample database of medical procedure codes with 2005 dates of service. Data was sampled from the Industry Claims Information System¹, a proprietary database of claim and benefit payment information. Each procedure code was mapped to

¹The California Workers' Compensation Institute's Industry Claims Information System (ICIS) currently encompasses transaction-level data on more than 3.5 million California workers' compensation claims contributed by large and midsize national and regional insurers and self-insured employers for claims with dates of injury from 1993 to 2005.

a fee schedule section. This encounter data also included the injured worker's zip code information which allowed the authors to model different Medicare regional fee schedules.

In order to model the potential effect of the Medicare Fee Schedule on the entire California Workers' Compensation System, the authors compiled additional system-wide medical payment data, summarized in Table Two.

Table Two. Estimate of Total Payments for Evaluation and Management Services

| | |
|---|-------------|
| Total Physician Medical Payout (\$000s) – Insured 2005 | \$1,900,000 |
| Total Physician Medical Payout (\$000s) - Industry 2005 | \$2,375,000 |
| E&M Payments (% of Industrywide Medical Payout) | 21.4% |
| Estimated E&M Payout (2005) | \$508,250 |

Total physician payments for the insured population of injured workers in calendar year 2005 were estimated using the WCIRB report of Losses and Expenses. The physician payment amount of \$1.9 billion was then adjusted by a factor of 1.25 to account for self-insured employer data not reported to the WCIRB resulting in a total estimated medical payout for physician services in 2005 of \$2.4 billion.²

The proportion of the \$2.4 billion in physician payments related to evaluation and management services was estimated using data from the ICIS database. Table Three displays summary information about the study sample which encompasses 6 million outpatient services across the 12 sub-sections of the physician section of the OMFS.

Table Three. Sample Distribution of 2005 Date of Service Procedures, Billed and Paid Amounts by Fee Schedule Section

| Fee Schedule Section | Volume | Billed Dollars | Paid Dollars |
|------------------------------|------------------|----------------------|----------------------|
| Acupuncture | 38,356 | \$3,088,856 | \$2,378,238 |
| Anesthesiology | 70,132 | \$25,295,207 | \$10,906,365 |
| Chiropractic Manipulation | 224,622 | \$10,142,434 | \$7,956,621 |
| Evaluation. & Mgmt. | 1,201,442 | \$154,315,288 | \$94,203,218 |
| Medical Treatment | 223,538 | \$38,402,351 | \$25,755,776 |
| Medical/Legal | 89,742 | \$67,743,044 | \$64,521,419 |
| Osteopathic Manipulation | 1,859 | \$135,863 | \$81,221 |
| Path/Laboratory | 164,566 | \$9,893,618 | \$2,703,637 |
| Physical Medicine | 2,547,809 | \$107,837,668 | \$65,350,158 |
| Radiology | 382,243 | \$107,487,482 | \$43,879,429 |
| Special Services | 785,822 | \$47,258,174 | \$29,625,936 |
| Surgery | 238,765 | \$253,325,525 | \$92,483,520 |
| Grand Total | 5,968,896 | \$824,925,510 | \$439,845,538 |
| E&M Pcnt of Total | 20.1% | 18.7% | 21.4% |

² Benefits, Coverage and Costs, 2004, National Academy of Social Insurance, Ishita Sengupta, Virginia Reno and John F Burton, Jr., July, 2006

The sample in Table Three contains \$825 million in billed charges and \$440 million in payments for medical services rendered to injured workers in California in calendar year 2005. Each medical procedure is mapped to a specific section of the fee schedule through a crosswalk of CPT codes. The 1.2 million E&M codes represent 20.1% of all codes in the distribution. E&M billings totaled \$154 million, or 18.7% of all dollars billed for physician services with a total of \$94 million or 21.4% of all dollars paid.

The total amount that was paid for all the E&M services in the study sample (Table Three) was \$94.2M. For the final step in developing the system-wide baseline, the total payments to physicians for E&M services were assessed by multiplying the 21.4% of all payments accounted for by E&M services by the estimated \$2.4 billion paid to physicians to treat injured workers. That calculation shows that in 2005, California workers' compensation payments to physicians for E&M services totaled an estimated \$508 million.

After deriving the system-wide baseline E&M payments for 2005, a series of models were developed to estimate the change to the baseline payments if the workers' compensation visits were reimbursed at maximum Medicare allowances. The Institute derived the alternative scenarios from the nine different Medicare fee schedules specific to the nine Medicare regions in California, and then compared the estimated payments under each schedule. In addition, a tenth scenario was added using a weighted average of Medicare fees based on the geographic mix of services extracted from the ICIS database.

The Medicare geographic regions, based on specific counties in California, are:

- Los Angeles
- Orange
- Ventura
- Santa Clara
- Alameda/Contra Costa
- San Mateo
- San Francisco
- Marin/Napa/Solano
- The Rest of California

Using ICIS data, the analysts compiled the number of encounters for services with dates of service during 2005 and assigned each encounter to a geographic region based on the zip code of the injured workers' home address and calculated the distribution of encounters, broken out by specific CPT code, across the nine geographic regions of the state (Table Four).

Table Four. Percent of E&M Encounters by Type by Medicare Region

| CPT Code | Marin | SF | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | TOTAL |
|----------|-------|------|-----------|---------|-------------|---------|-------------|---------|------------|--------|
| 99201 | 2.8% | 2.3% | 2.4% | 6.1% | 5.2% | 2.6% | 18.4% | 4.9% | 55.2% | 100.0% |
| 99202 | 4.6% | 2.1% | 1.8% | 8.0% | 4.6% | 1.3% | 14.0% | 4.1% | 59.6% | 100.0% |
| 99203 | 2.2% | 1.1% | 1.8% | 5.7% | 4.6% | 3.0% | 21.2% | 5.0% | 55.6% | 100.0% |
| 99204 | 1.5% | 2.1% | 1.4% | 5.9% | 2.5% | 3.2% | 21.8% | 6.0% | 55.6% | 100.0% |
| 99205 | 0.8% | 1.6% | 1.0% | 4.4% | 3.1% | 3.8% | 37.9% | 7.9% | 39.5% | 100.0% |
| 99211 | 1.4% | 1.5% | 1.4% | 4.3% | 4.4% | 1.5% | 22.7% | 6.8% | 56.0% | 100.0% |
| 99212 | 2.5% | 1.6% | 2.6% | 5.9% | 3.6% | 1.3% | 26.8% | 4.2% | 51.4% | 100.0% |
| 99213 | 2.8% | 1.3% | 1.8% | 7.3% | 4.2% | 2.4% | 18.0% | 4.2% | 57.9% | 100.0% |
| 99214 | 1.6% | 1.8% | 1.4% | 8.2% | 3.8% | 3.4% | 23.7% | 7.1% | 48.9% | 100.0% |
| 99215 | 0.8% | 0.9% | 0.7% | 5.5% | 3.8% | 2.0% | 36.7% | 9.5% | 40.1% | 100.0% |
| 99217 | 3.8% | 0.0% | 1.1% | 1.6% | 1.6% | 0.5% | 8.7% | 2.2% | 80.3% | 100.0% |
| 99218 | 1.0% | 0.3% | 0.6% | 6.5% | 5.2% | 1.7% | 29.6% | 10.8% | 44.2% | 100.0% |
| 99219 | 0.6% | 1.1% | 1.7% | 16.7% | 1.1% | 0.0% | 9.4% | 0.6% | 68.9% | 100.0% |
| 99220 | 0.0% | 0.0% | 0.3% | 0.0% | 0.3% | 0.3% | 62.1% | 15.0% | 21.8% | 100.0% |
| 99221 | 3.5% | 0.0% | 2.0% | 3.5% | 1.8% | 5.5% | 20.4% | 3.8% | 59.5% | 100.0% |
| 99222 | 1.7% | 0.4% | 0.8% | 3.1% | 3.1% | 2.6% | 29.4% | 8.9% | 49.9% | 100.0% |
| 99223 | 1.2% | 0.5% | 0.9% | 2.9% | 1.9% | 4.0% | 31.4% | 7.8% | 49.4% | 100.0% |
| 99231 | 2.3% | 1.5% | 2.3% | 3.3% | 2.9% | 3.2% | 24.2% | 5.4% | 54.8% | 100.0% |
| 99232 | 2.1% | 1.1% | 3.0% | 4.6% | 1.7% | 2.4% | 27.6% | 7.3% | 50.2% | 100.0% |
| 99233 | 1.7% | 0.9% | 2.7% | 3.1% | 1.6% | 5.6% | 30.4% | 8.5% | 45.4% | 100.0% |
| 99234 | 0.0% | 0.6% | 0.0% | 1.1% | 0.6% | 0.0% | 5.5% | 2.8% | 89.5% | 100.0% |
| 99238 | 1.7% | 0.8% | 1.2% | 3.9% | 3.2% | 2.1% | 24.8% | 7.6% | 54.7% | 100.0% |
| 99239 | 2.3% | 0.5% | 0.7% | 8.0% | 5.4% | 4.7% | 23.5% | 7.5% | 47.4% | 100.0% |
| 99241 | 2.6% | 1.1% | 1.6% | 10.7% | 3.3% | 2.8% | 27.2% | 3.7% | 46.9% | 100.0% |
| 99242 | 2.6% | 0.9% | 2.1% | 6.4% | 3.0% | 2.1% | 26.1% | 6.9% | 49.8% | 100.0% |
| 99243 | 2.6% | 1.2% | 1.7% | 6.8% | 3.3% | 1.4% | 18.3% | 4.4% | 60.2% | 100.0% |
| 99244 | 1.9% | 1.3% | 1.7% | 7.4% | 4.5% | 2.2% | 24.0% | 7.2% | 49.6% | 100.0% |
| 99245 | 0.9% | 1.0% | 0.9% | 4.9% | 3.3% | 1.7% | 37.6% | 10.1% | 39.7% | 100.0% |
| 99251 | 2.3% | 0.0% | 1.2% | 5.8% | 2.3% | 1.2% | 27.9% | 3.5% | 55.8% | 100.0% |
| 99252 | 1.5% | 0.5% | 1.0% | 5.4% | 2.5% | 2.0% | 17.8% | 5.4% | 63.9% | 100.0% |
| 99253 | 2.5% | 2.5% | 1.5% | 5.1% | 1.1% | 2.2% | 25.2% | 8.4% | 51.5% | 100.0% |
| 99254 | 1.5% | 0.9% | 1.0% | 4.2% | 1.5% | 1.7% | 36.1% | 6.8% | 46.2% | 100.0% |
| 99255 | 1.7% | 1.4% | 2.2% | 3.2% | 2.3% | 3.7% | 32.8% | 9.7% | 42.9% | 100.0% |
| 99261 | 0.0% | 7.0% | 0.0% | 5.1% | 7.0% | 3.2% | 39.5% | 4.5% | 33.8% | 100.0% |
| 99262 | 2.4% | 7.8% | 1.4% | 10.5% | 3.0% | 0.3% | 28.1% | 5.1% | 41.4% | 100.0% |
| 99263 | 4.6% | 0.2% | 0.7% | 3.2% | 0.2% | 0.7% | 40.5% | 8.8% | 41.0% | 100.0% |
| 99272 | 5.9% | 1.5% | 1.5% | 7.4% | 0.0% | 0.0% | 8.8% | 4.4% | 70.6% | 100.0% |
| 99273 | 4.5% | 0.6% | 0.6% | 14.1% | 1.8% | 1.7% | 18.6% | 19.1% | 39.0% | 100.0% |
| 99274 | 4.6% | 1.7% | 1.0% | 4.1% | 1.7% | 5.3% | 26.5% | 6.5% | 48.5% | 100.0% |
| 99275 | 1.4% | 1.4% | 0.7% | 2.4% | 3.0% | 3.9% | 32.0% | 13.6% | 41.6% | 100.0% |
| 99281 | 2.1% | 1.0% | 1.4% | 7.5% | 2.4% | 1.9% | 16.6% | 4.7% | 62.2% | 100.0% |
| 99282 | 2.7% | 2.2% | 2.4% | 8.0% | 5.0% | 2.9% | 14.5% | 4.3% | 58.1% | 100.0% |
| 99283 | 3.4% | 2.1% | 2.6% | 8.4% | 4.1% | 2.2% | 13.4% | 4.0% | 59.7% | 100.0% |
| 99284 | 2.9% | 1.1% | 1.5% | 6.2% | 2.9% | 1.9% | 16.3% | 4.6% | 62.4% | 100.0% |
| 99285 | 2.4% | 0.6% | 1.2% | 4.2% | 3.4% | 1.9% | 18.3% | 6.6% | 61.3% | 100.0% |
| 99291 | 1.4% | 2.6% | 6.5% | 3.5% | 3.0% | 3.5% | 17.3% | 8.6% | 53.7% | 100.0% |
| 99292 | 1.5% | 2.0% | 1.5% | 9.3% | 6.7% | 2.6% | 16.3% | 17.5% | 42.6% | 100.0% |
| 99303 | 0.0% | 0.0% | 1.5% | 5.9% | 8.8% | 1.5% | 16.2% | 8.8% | 57.4% | 100.0% |
| 99311 | 0.0% | 0.0% | 0.0% | 12.5% | 1.6% | 0.0% | 48.4% | 6.3% | 31.3% | 100.0% |
| 99312 | 0.5% | 0.0% | 0.0% | 10.0% | 20.9% | 0.0% | 15.9% | 3.2% | 49.5% | 100.0% |
| 99313 | 0.3% | 0.0% | 0.0% | 5.3% | 8.5% | 0.0% | 68.3% | 7.1% | 10.6% | 100.0% |

Fee Schedule Analysis
January 2007

| CPT Code | Marin | SF | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | TOTAL |
|--------------|-------|------|-----------|---------|-------------|---------|-------------|---------|------------|--------|
| 99332 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 100.0% | 100.0% |
| 99341 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 6.1% | 0.0% | 93.9% | 100.0% |
| 99342 | 0.0% | 0.0% | 0.0% | 0.0% | 7.7% | 3.8% | 9.6% | 3.8% | 75.0% | 100.0% |
| 99342 | 0.0% | 0.0% | 0.0% | 0.0% | 7.7% | 3.8% | 9.6% | 3.8% | 75.0% | 100.0% |
| 99344 | 0.0% | 0.0% | 0.0% | 3.6% | 0.0% | 0.0% | 0.0% | 0.0% | 96.4% | 100.0% |
| 99348 | 0.0% | 0.7% | 0.0% | 83.5% | 0.0% | 0.0% | 0.7% | 2.9% | 12.1% | 100.0% |
| 99349 | 1.1% | 0.0% | 0.0% | 79.5% | 0.0% | 0.0% | 1.3% | 7.0% | 11.0% | 100.0% |
| 99350 | 4.4% | 1.5% | 1.5% | 2.9% | 0.0% | 0.0% | 13.2% | 0.0% | 76.5% | 100.0% |
| 99351 | 0.0% | 0.0% | 0.0% | 0.3% | 0.3% | 0.0% | 27.1% | 3.6% | 68.8% | 100.0% |
| 99352 | 0.0% | 0.0% | 0.0% | 5.7% | 0.7% | 0.0% | 2.1% | 6.4% | 85.0% | 100.0% |
| 99353 | 5.5% | 6.3% | 0.4% | 12.2% | 2.1% | 0.0% | 8.4% | 6.7% | 58.4% | 100.0% |
| 99354 | 1.6% | 4.1% | 2.0% | 9.0% | 4.0% | 1.2% | 33.5% | 9.5% | 35.0% | 100.0% |
| 99355 | 0.5% | 0.3% | 0.4% | 2.6% | 1.7% | 0.4% | 51.3% | 11.8% | 31.0% | 100.0% |
| 99356 | 0.9% | 0.9% | 0.0% | 1.9% | 0.9% | 1.9% | 20.4% | 2.8% | 70.4% | 100.0% |
| 99357 | 0.0% | 0.0% | 0.0% | 0.0% | 0.3% | 2.0% | 78.1% | 1.3% | 18.3% | 100.0% |
| 99361 | 1.5% | 2.2% | 3.2% | 11.1% | 3.5% | 1.9% | 22.7% | 3.0% | 50.7% | 100.0% |
| 99362 | 0.6% | 1.1% | 1.9% | 5.1% | 3.0% | 6.6% | 49.8% | 3.0% | 28.8% | 100.0% |
| 99371 | 1.8% | 1.4% | 3.4% | 8.2% | 8.8% | 1.7% | 24.7% | 9.2% | 40.8% | 100.0% |
| 99372 | 3.9% | 1.4% | 2.1% | 10.4% | 6.8% | 0.7% | 21.6% | 5.8% | 47.2% | 100.0% |
| 99373 | 1.9% | 1.6% | 2.0% | 7.4% | 7.2% | 4.6% | 34.8% | 4.8% | 35.6% | 100.0% |
| 99401 | 1.4% | 0.0% | 1.4% | 7.2% | 5.8% | 0.0% | 46.4% | 5.8% | 31.9% | 100.0% |
| Total | 2.1% | 1.5% | 1.7% | 7.1% | 3.9% | 2.6% | 23.0% | 6.0% | 52.1% | 100.0% |

The authors were surprised that more than half (52.1%) of E&M associated visits were provided in the “Rest of California” region. To gain a better understanding of the geographic composition of this region, they analyzed the counties within the “Rest of California” region and compiled the following distribution of visits within the “Rest of California” category (Table Five).

Table Five. Counties included in the “Rest of California” Region

| COUNTY | OFFICE VISIT VOLUME | PERCENT OF TOTAL OFFICE VISITS |
|-----------------|---------------------|--------------------------------|
| San Diego | 95,900 | 7.17% |
| San Bernardino | 66,222 | 4.95% |
| Riverside | 61,738 | 4.62% |
| Sacramento | 51,308 | 3.84% |
| Fresno | 47,387 | 3.54% |
| Kern | 33,253 | 2.49% |
| San Joaquin | 31,419 | 2.35% |
| Stanislaus | 30,390 | 2.27% |
| Sonoma | 26,772 | 2.00% |
| Tulare | 25,752 | 1.93% |
| Blanks | 22,812 | 1.71% |
| Monterey | 21,764 | 1.63% |
| Santa Barbara | 19,641 | 1.47% |
| Merced | 15,025 | 1.12% |
| Santa Cruz | 14,135 | 1.06% |
| Shasta | 11,479 | 0.86% |
| Butte | 9,737 | 0.73% |
| San Luis Obispo | 9,736 | 0.73% |

| COUNTY | OFFICE VISIT VOLUME | PERCENT OF TOTAL OFFICE VISITS |
|--------------------|---------------------|--------------------------------|
| Placer | 9,014 | 0.67% |
| Imperial | 8,757 | 0.66% |
| Humboldt | 8,653 | 0.65% |
| Madera | 8,194 | 0.61% |
| Yolo | 7,681 | 0.57% |
| Mendocino | 7,392 | 0.55% |
| Kings | 7,267 | 0.54% |
| All Other Counties | 47,362 | 3.54% |
| Total "Rest of CA" | 698,790 | 52.27% |

Several counties with significant population bases are included in the "Rest of California" Medicare region including San Diego (third largest), San Bernardino (fourth largest), Riverside (fifth largest) and Sacramento (eighth largest). (Source: California State Association of Counties). (There were also 22,812 office visits with no county locator in the ICIS database that were included in the tally for the "Rest of California" region.)

The analysts applied the CPT code distribution from the 9 geographic regions (Table Four) to the corresponding Medicare fee schedules to develop a prorated fee schedule that would reflect the mix of E&M services within each region. The prorated fee schedule became the basis for the tenth comparison scenario; the weighted average cost.

Results

The Institute compared the Official Medical Fee Schedule for E&M CPT codes to the corresponding Medicare fees for each of the 9 California regions as well as the regional adjusted weighted average (Table Six). Table Seven displays the percentage difference between the OMFS and each of the Medicare schedules, including the weighted average of all regions ("Weighted Average").

Table Six. Evaluation and Management fee Schedules for the California Regions and the Calculated Weighted Average Medicare Fees

| Procedure Code | Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|----------------|----------|---------------|-----------|----------|-------------|----------|-------------|----------|------------|------------------|
| 99201 | \$43.27 | \$47.47 | \$47.55 | \$44.17 | \$47.75 | \$40.27 | \$40.30 | \$41.67 | \$37.56 | \$39.90 |
| 99202 | \$75.87 | \$82.78 | \$82.98 | \$77.43 | \$83.37 | \$70.99 | \$71.13 | \$73.30 | \$66.50 | \$70.19 |
| 99203 | \$112.16 | \$122.13 | \$122.45 | \$114.46 | \$123.01 | \$105.23 | \$105.62 | \$108.69 | \$98.73 | \$103.86 |
| 99204 | \$157.58 | \$171.02 | \$171.55 | \$160.78 | \$172.38 | \$148.32 | \$148.96 | \$152.97 | \$139.52 | \$146.12 |
| 99205 | \$198.82 | \$215.05 | \$215.82 | \$202.84 | \$216.90 | \$187.78 | \$188.74 | \$193.43 | \$177.09 | \$186.73 |
| 99211 | \$26.72 | \$29.88 | \$29.86 | \$27.30 | \$29.97 | \$24.33 | \$24.15 | \$25.29 | \$22.33 | \$23.81 |
| 99212 | \$45.81 | \$50.39 | \$50.46 | \$46.77 | \$50.67 | \$42.51 | \$42.49 | \$44.01 | \$39.56 | \$42.02 |
| 99213 | \$62.06 | \$68.00 | \$68.14 | \$63.35 | \$68.46 | \$57.78 | \$57.75 | \$59.66 | \$53.94 | \$56.93 |
| 99214 | \$96.69 | \$105.65 | \$105.90 | \$98.69 | \$106.40 | \$90.29 | \$90.33 | \$93.16 | \$84.47 | \$89.57 |
| 99215 | \$138.43 | \$150.27 | \$150.75 | \$141.26 | \$151.52 | \$130.19 | \$130.55 | \$134.08 | \$122.45 | \$129.41 |

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| Procedure Code | San Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|----------------|-----------|---------------|-----------|----------|-------------|----------|-------------|----------|------------|------------------|
| 99217 | \$78.60 | \$83.89 | \$84.35 | \$80.15 | \$84.84 | \$75.24 | \$75.89 | \$77.15 | \$71.67 | \$72.94 |
| 99218 | \$74.03 | \$78.63 | \$79.12 | \$75.47 | \$79.59 | \$71.22 | \$71.94 | \$72.94 | \$68.07 | \$71.04 |
| 99219 | \$122.97 | \$130.54 | \$131.35 | \$125.36 | \$132.14 | \$118.36 | \$119.58 | \$121.20 | \$113.18 | \$116.62 |
| 99220 | \$173.04 | \$183.80 | \$184.93 | \$176.40 | \$186.04 | \$166.46 | \$168.14 | \$170.47 | \$159.10 | \$166.63 |
| 99221 | \$74.79 | \$79.46 | \$79.94 | \$76.24 | \$80.40 | \$71.95 | \$72.74 | \$73.77 | \$68.75 | \$70.84 |
| 99222 | \$123.99 | \$131.71 | \$132.52 | \$126.40 | \$133.31 | \$119.26 | \$120.46 | \$122.14 | \$113.98 | \$118.13 |
| 99223 | \$172.79 | \$183.55 | \$184.69 | \$176.16 | \$185.81 | \$166.17 | \$167.78 | \$170.11 | \$158.82 | \$164.34 |
| 99231 | \$37.52 | \$39.90 | \$40.14 | \$38.25 | \$40.38 | \$36.06 | \$36.41 | \$36.94 | \$34.44 | \$35.69 |
| 99232 | \$61.35 | \$65.20 | \$65.61 | \$62.55 | \$66.02 | \$58.96 | \$59.47 | \$60.31 | \$56.33 | \$58.48 |
| 99233 | \$87.12 | \$92.55 | \$93.13 | \$88.81 | \$93.70 | \$83.75 | \$84.52 | \$85.70 | \$80.04 | \$83.18 |
| 99234 | \$148.82 | \$158.09 | \$159.06 | \$151.71 | \$159.99 | \$143.17 | \$144.69 | \$146.71 | \$136.82 | \$137.94 |
| 99238 | \$78.86 | \$84.23 | \$84.69 | \$80.42 | \$85.20 | \$75.40 | \$75.96 | \$77.26 | \$71.79 | \$74.45 |
| 99239 | \$107.44 | \$114.71 | \$115.35 | \$109.56 | \$116.03 | \$102.77 | \$103.55 | \$105.30 | \$97.86 | \$102.33 |
| 99241 | \$58.84 | \$64.37 | \$64.49 | \$60.05 | \$64.76 | \$54.94 | \$55.09 | \$56.87 | \$51.35 | \$54.61 |
| 99242 | \$105.88 | \$115.10 | \$115.42 | \$108.03 | \$115.93 | \$99.54 | \$100.07 | \$102.88 | \$93.51 | \$98.60 |
| 99243 | \$141.26 | \$153.58 | \$154.00 | \$144.13 | \$154.69 | \$132.78 | \$133.45 | \$137.21 | \$124.72 | \$130.58 |
| 99244 | \$198.08 | \$214.60 | \$215.31 | \$202.09 | \$216.36 | \$186.79 | \$187.74 | \$192.60 | \$175.93 | \$185.59 |
| 99245 | \$255.11 | \$275.89 | \$276.88 | \$260.25 | \$278.24 | \$241.03 | \$242.40 | \$248.41 | \$227.34 | \$239.80 |
| 99251 | \$39.31 | \$41.78 | \$42.02 | \$40.07 | \$42.24 | \$37.85 | \$38.36 | \$38.91 | \$36.15 | \$37.39 |
| 99252 | \$79.39 | \$84.48 | \$84.96 | \$80.93 | \$85.42 | \$76.30 | \$77.23 | \$78.40 | \$72.83 | \$75.01 |
| 99253 | \$108.63 | \$115.59 | \$116.26 | \$110.74 | \$116.90 | \$104.39 | \$105.57 | \$107.15 | \$99.65 | \$103.50 |
| 99254 | \$156.53 | \$166.57 | \$167.55 | \$159.58 | \$168.52 | \$150.30 | \$151.78 | \$154.06 | \$143.47 | \$149.01 |
| 99255 | \$215.77 | \$229.61 | \$230.96 | \$219.98 | \$232.31 | \$207.20 | \$209.25 | \$212.38 | \$197.79 | \$206.33 |
| 99261 | \$37.52 | \$39.90 | \$40.14 | \$38.25 | \$40.38 | \$36.06 | \$36.41 | \$36.94 | \$34.44 | \$36.37 |
| 99262 | \$61.35 | \$65.20 | \$65.61 | \$62.55 | \$66.02 | \$58.96 | \$59.47 | \$60.31 | \$56.33 | \$59.31 |
| 99263 | \$87.12 | \$92.55 | \$93.13 | \$88.81 | \$93.70 | \$83.75 | \$84.52 | \$85.70 | \$80.04 | \$83.14 |
| 99272 | \$105.88 | \$115.10 | \$115.42 | \$108.03 | \$115.93 | \$99.54 | \$100.07 | \$102.88 | \$93.51 | \$96.94 |
| 99273 | \$141.26 | \$153.58 | \$154.00 | \$144.13 | \$154.69 | \$132.78 | \$133.45 | \$137.21 | \$124.72 | \$133.26 |
| 99274 | \$198.08 | \$214.60 | \$215.31 | \$202.09 | \$216.36 | \$186.79 | \$187.74 | \$192.60 | \$175.93 | \$184.59 |
| 99275 | \$255.11 | \$275.89 | \$276.88 | \$260.25 | \$278.24 | \$241.03 | \$242.40 | \$248.41 | \$227.34 | \$239.28 |
| 99281 | \$18.01 | \$19.01 | \$19.14 | \$18.35 | \$19.25 | \$17.44 | \$17.68 | \$17.87 | \$16.74 | \$17.23 |
| 99282 | \$29.67 | \$31.27 | \$31.48 | \$30.23 | \$31.66 | \$28.81 | \$29.28 | \$29.56 | \$27.69 | \$28.66 |
| 99283 | \$66.60 | \$70.16 | \$70.65 | \$67.86 | \$71.05 | \$64.70 | \$65.75 | \$66.37 | \$62.19 | \$64.27 |
| 99284 | \$103.81 | \$109.27 | \$110.04 | \$105.76 | \$110.67 | \$100.92 | \$102.58 | \$103.49 | \$97.06 | \$99.80 |
| 99285 | \$162.26 | \$170.70 | \$171.91 | \$165.31 | \$172.88 | \$157.87 | \$160.58 | \$161.95 | \$151.90 | \$156.17 |
| 99291 | \$226.69 | \$240.31 | \$241.84 | \$231.06 | \$243.27 | \$218.56 | \$221.08 | \$223.9 | \$209.18 | \$217.78 |
| 99292 | \$113.66 | \$120.48 | \$121.25 | \$115.85 | \$121.96 | \$109.61 | \$110.92 | \$112.33 | \$104.92 | \$110.16 |
| 99303 | \$37.99 | \$40.63 | \$40.84 | \$38.74 | \$41.07 | \$36.28 | \$36.58 | \$37.24 | \$34.51 | \$36.03 |
| 99311 | \$88.66 | \$94.78 | \$95.29 | \$90.41 | \$95.84 | \$84.72 | \$85.35 | \$86.86 | \$80.60 | \$84.76 |
| 99312 | \$111.01 | \$118.69 | \$119.32 | \$113.20 | \$120.00 | \$106.06 | \$106.89 | \$108.79 | \$100.90 | \$107.37 |
| 99313 | \$73.19 | \$78.09 | \$78.53 | \$74.63 | \$78.99 | \$70.05 | \$70.62 | \$71.78 | \$66.74 | \$71.22 |
| 99332 | \$123.09 | \$131.32 | \$132.05 | \$125.51 | \$132.82 | \$117.87 | \$118.87 | \$120.82 | \$112.31 | \$112.31 |
| 99341 | \$65.23 | \$69.88 | \$70.22 | \$66.52 | \$70.61 | \$62.20 | \$62.68 | \$63.87 | \$59.09 | \$59.31 |
| 99342 | \$139.24 | \$148.62 | \$149.45 | \$141.98 | \$150.32 | \$133.26 | \$134.35 | \$136.60 | \$126.92 | \$130.05 |
| 99344 | \$181.98 | \$193.93 | \$195.05 | \$185.55 | \$196.2 | \$174.43 | \$175.93 | \$178.71 | \$166.33 | \$167.03 |
| 99348 | \$80.36 | \$86.01 | \$86.45 | \$81.95 | \$86.94 | \$76.69 | \$77.29 | \$78.71 | \$72.9 | \$80.75 |
| 99349 | \$123.6 | \$131.9 | \$132.64 | \$126.03 | \$133.41 | \$118.32 | \$119.31 | \$121.29 | \$112.71 | \$124.11 |

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| Procedure Code | San Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|-----------------|--------------|---------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------|------------------|
| 99350 | \$181.98 | \$193.93 | \$195.05 | \$185.55 | \$196.2 | \$174.43 | \$175.93 | \$178.71 | \$166.33 | \$169.68 |
| 99351 | \$51.11 | \$54.91 | \$55.16 | \$52.13 | \$55.45 | \$48.61 | \$48.95 | \$49.96 | \$46.08 | \$47.04 |
| 99352 | \$123.60 | \$131.90 | \$132.64 | \$126.03 | \$133.41 | \$118.32 | \$119.31 | \$121.29 | \$112.71 | \$114.31 |
| 99353 | \$181.98 | \$193.93 | \$195.05 | \$185.55 | \$196.20 | \$174.43 | \$175.93 | \$178.71 | \$166.33 | \$173.65 |
| 99354 | \$110.50 | \$118.10 | \$118.73 | \$112.68 | \$119.42 | \$105.62 | \$106.45 | \$108.32 | \$100.50 | \$106.40 |
| 99355 | \$109.24 | \$116.69 | \$117.33 | \$111.40 | \$118.02 | \$104.44 | \$105.22 | \$107.02 | \$99.42 | \$104.12 |
| 99356 | \$100.29 | \$106.68 | \$107.32 | \$102.24 | \$107.97 | \$96.30 | \$97.15 | \$98.58 | \$91.94 | \$93.82 |
| 99357 | \$101.04 | \$107.51 | \$108.15 | \$103.01 | \$108.78 | \$97.02 | \$97.95 | \$99.41 | \$92.62 | \$97.01 |
| 99358 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 | \$36.34 |
| 99361 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 | \$92.06 |
| 99362 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 | \$144.54 |
| 99371 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 | \$12.92 |
| 99372 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 | \$33.11 |
| 99373 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 | \$66.22 |
| 99401 | \$50.56 | \$55.78 | \$55.85 | \$51.63 | \$56.11 | \$46.68 | \$46.46 | \$48.21 | \$43.34 | \$46.70 |
| 99499 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 | \$434.91 |
| Pcnt Dif | 20.7% | 30.9% | 31.3% | 23.1% | 31.9% | 13.5% | 13.8% | 16.9% | 6.8% | 12.4% |

Table Seven. Comparison of California's Official Medical Fee Schedule for Office Visits to Regional Medicare Rates

| Procedure Code | San Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|----------------|-----------|---------------|-----------|---------|-------------|---------|-------------|---------|------------|------------------|
| 99201 | 10.7% | 21.4% | 21.6% | 13.0% | 22.1% | 3.0% | 3.1% | 6.6% | -3.9% | 2.1% |
| 99202 | 31.3% | 43.2% | 43.6% | 34.0% | 44.2% | 22.8% | 23.1% | 26.8% | 15.1% | 21.4% |
| 99203 | 46.6% | 59.6% | 60.1% | 49.6% | 60.8% | 37.6% | 38.1% | 42.1% | 29.1% | 35.8% |
| 99204 | 43.7% | 56.0% | 56.5% | 46.6% | 57.2% | 35.3% | 35.9% | 39.5% | 27.2% | 33.3% |
| 99205 | 36.8% | 48.0% | 48.5% | 39.6% | 49.2% | 29.2% | 29.9% | 33.1% | 21.8% | 28.5% |
| 99211 | 12.3% | 25.5% | 25.5% | 14.7% | 25.9% | 2.2% | 1.5% | 6.3% | -6.2% | 0.0% |
| 99212 | 28.3% | 41.1% | 41.3% | 31.0% | 41.9% | 19.1% | 19.0% | 23.3% | 10.8% | 17.7% |
| 99213 | 30.4% | 42.9% | 43.2% | 33.1% | 43.8% | 21.4% | 21.3% | 25.3% | 13.3% | 19.6% |
| 99214 | 33.8% | 46.2% | 46.6% | 36.6% | 47.3% | 25.0% | 25.0% | 28.9% | 16.9% | 24.0% |
| 99215 | 25.3% | 36.0% | 36.4% | 27.8% | 37.1% | 17.8% | 18.1% | 21.3% | 10.8% | 17.1% |
| 99217 | 2.5% | 9.4% | 10.0% | 4.5% | 10.6% | -1.9% | -1.1% | 0.6% | -6.6% | -4.9% |
| 99218 | -24.9% | -20.2% | -19.7% | -23.4% | -19.2% | -27.7% | -27.0% | -26.0% | -30.9% | -27.9% |
| 99219 | -12.0% | -6.6% | -6.0% | -10.3% | -5.4% | -15.3% | -14.4% | -13.2% | -19.0% | -16.5% |
| 99220 | -2.6% | 3.5% | 4.1% | -0.7% | 4.7% | -6.3% | -5.4% | -4.0% | -10.4% | -6.2% |
| 99221 | -24.1% | -19.3% | -18.9% | -22.6% | -18.4% | -27.0% | -26.2% | -25.1% | -30.2% | -28.1% |
| 99222 | -11.2% | -5.7% | -5.1% | -9.5% | -4.6% | -14.6% | -13.8% | -12.6% | -18.4% | -15.4% |
| 99223 | -2.7% | 3.3% | 4.0% | -0.8% | 4.6% | -6.5% | -5.6% | -4.2% | -10.6% | -7.5% |
| 99231 | -40.4% | -36.7% | -36.3% | -39.3% | -35.9% | -42.7% | -42.2% | -41.4% | -45.3% | -43.3% |
| 99232 | -32.8% | -28.5% | -28.1% | -31.5% | -27.6% | -35.4% | -34.8% | -33.9% | -38.3% | -35.9% |
| 99233 | -29.0% | -24.6% | -24.1% | -27.6% | -23.7% | -31.8% | -31.1% | -30.2% | -34.8% | -32.2% |
| 99234 | -86.8% | -86.0% | -85.9% | -86.6% | -85.8% | -87.3% | -87.2% | -87.0% | -87.9% | -87.8% |
| 99238 | 10.4% | 18.0% | 18.6% | 12.6% | 19.3% | 5.6% | 6.4% | 8.2% | 0.5% | 94.3% |
| 99239 | 20.4% | 28.5% | 29.2% | 22.8% | 30.0% | 15.1% | 16.0% | 18.0% | 9.6% | -16.6% |
| 99241 | -25.6% | -18.7% | -18.5% | -24.1% | -18.2% | -30.6% | -30.4% | -28.1% | -35.1% | 29.3% |

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| Procedure Code | Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|----------------|--------|---------------|-----------|---------|-------------|---------|-------------|---------|------------|------------------|
| 99242 | 0.9% | 9.6% | 9.9% | 2.9% | 10.4% | -5.2% | -4.7% | -2.0% | -10.9% | -48.0% |
| 99243 | 7.3% | 16.7% | 17.0% | 9.5% | 17.5% | 0.9% | 1.4% | 4.2% | -5.2% | -25.1% |
| 99244 | 7.2% | 16.1% | 16.5% | 9.3% | 17.0% | 1.0% | 1.6% | 4.2% | -4.8% | -29.4% |
| 99245 | 6.8% | 15.5% | 16.0% | 9.0% | 16.5% | 0.9% | 1.5% | 4.0% | -4.8% | -22.3% |
| 99251 | -54.1% | -51.2% | -50.9% | -53.2% | -50.7% | -55.8% | -55.2% | -54.5% | -57.8% | 180.2% |
| 99252 | -29.8% | -25.3% | -24.8% | -28.4% | -24.4% | -32.5% | -31.7% | -30.7% | -35.6% | -66.9% |
| 99253 | -23.6% | -18.7% | -18.2% | -22.1% | -17.7% | -26.5% | -25.7% | -24.6% | -29.9% | -47.2% |
| 99254 | -17.9% | -12.6% | -12.1% | -16.3% | -11.6% | -21.1% | -20.4% | -19.2% | -24.7% | -45.7% |
| 99255 | -11.5% | -5.8% | -5.3% | -9.8% | -4.7% | -15.0% | -14.2% | -12.9% | -18.9% | -38.9% |
| 99261 | -25.1% | -20.3% | -19.8% | -23.6% | -19.3% | -28.0% | -27.3% | -26.2% | -31.2% | -27.3% |
| 99262 | -22.5% | -17.6% | -17.1% | -21.0% | -16.6% | -25.5% | -24.8% | -23.8% | -28.8% | -25.1% |
| 99263 | -24.0% | -19.3% | -18.8% | -22.5% | -18.3% | -27.0% | -26.3% | -25.3% | -30.2% | -27.5% |
| 99272 | 8.4% | 17.8% | 18.1% | 10.6% | 18.7% | 1.9% | 2.4% | 5.3% | -4.3% | -0.8% |
| 99273 | 10.7% | 20.4% | 20.7% | 13.0% | 21.2% | 4.1% | 4.6% | 7.5% | -2.2% | 4.4% |
| 99274 | 14.1% | 23.6% | 24.0% | 16.4% | 24.6% | 7.6% | 8.1% | 10.9% | 1.3% | 6.3% |
| 99275 | 12.0% | 21.2% | 21.6% | 14.3% | 22.2% | 5.8% | 6.4% | 9.1% | -0.2% | 5.1% |
| 99281 | -58.7% | -56.4% | -56.1% | -57.9% | -55.9% | -60.0% | -59.5% | -59.0% | -61.6% | 373.2% |
| 99282 | -49.0% | -46.2% | -45.9% | -48.0% | -45.5% | -50.4% | -49.6% | -49.2% | -52.4% | 82.5% |
| 99283 | -23.6% | -19.6% | -19.0% | -22.2% | -18.5% | -25.8% | -24.6% | -23.9% | -28.7% | -30.4% |
| 99284 | -20.2% | -16.0% | -15.4% | -18.7% | -14.9% | -22.4% | -21.1% | -20.4% | -25.3% | -33.4% |
| 99285 | -19.9% | -15.8% | -15.2% | -18.4% | -14.7% | -22.1% | -20.8% | -20.1% | -25.1% | -51.5% |
| 99291 | -17.3% | -12.3% | -11.8% | -15.7% | -11.3% | -20.3% | -19.4% | -18.3% | -23.7% | -20.6% |
| 99292 | -13.6% | -8.5% | -7.9% | -12.0% | -7.3% | -16.7% | -15.7% | -14.7% | -20.3% | -16.3% |
| 99303 | -65.6% | -63.2% | -63.0% | -64.9% | -62.8% | -67.2% | -66.9% | -66.3% | -68.8% | -67.4% |
| 99311 | 124.1% | 139.5% | 140.8% | 128.5% | 142.2% | 114.1% | 115.7% | 119.5% | 103.7% | 114.2% |
| 99312 | 100.9% | 114.8% | 116.0% | 104.9% | 117.2% | 92.0% | 93.5% | 96.9% | 82.6% | 94.3% |
| 99313 | -4.3% | 2.1% | 2.7% | -2.4% | 3.3% | -8.4% | -7.7% | -6.2% | -12.8% | -6.9% |
| 99332 | 117.8% | 132.3% | 133.6% | 122.0% | 135.0% | 108.5% | 110.3% | 113.7% | 98.7% | 98.7% |
| 99341 | -10.2% | -3.8% | -3.4% | -8.5% | -2.8% | -14.4% | -13.8% | -12.1% | -18.7% | 245.9% |
| 99342 | 51.3% | 61.4% | 62.3% | 54.2% | 63.3% | 44.8% | 45.9% | 48.4% | 37.9% | 41.3% |
| 99344 | 39.2% | 48.3% | 49.2% | 41.9% | 50.1% | 33.4% | 34.6% | 36.7% | 27.2% | 27.8% |
| 99348 | -81.3% | -80.0% | -79.9% | -81.0% | -79.8% | -82.2% | -82.1% | -81.7% | -83.1% | -81.3% |
| 99349 | -75.0% | -73.3% | -73.1% | -74.5% | -73.0% | -76.0% | -75.8% | -75.4% | -77.2% | -74.9% |
| 99350 | 10.5% | 17.8% | 18.5% | 12.7% | 19.2% | 6.0% | 6.9% | 8.6% | 1.0% | 3.1% |
| 99351 | -8.3% | -1.4% | -1.0% | -6.4% | -0.5% | -12.8% | -12.1% | -10.3% | -17.3% | -15.6% |
| 99352 | 68.2% | 79.5% | 80.5% | 71.5% | 81.6% | 61.0% | 62.4% | 65.1% | 53.4% | 55.6% |
| 99353 | 97.7% | 110.7% | 111.9% | 101.6% | 113.1% | 89.5% | 91.1% | 94.1% | 80.7% | 88.6% |
| 99354 | -35.5% | -31.0% | -30.6% | -34.2% | -30.2% | -38.3% | -37.8% | -36.7% | -41.3% | -83.3% |
| 99355 | 21.2% | 29.5% | 30.2% | 23.6% | 31.0% | 15.9% | 16.8% | 18.8% | 10.3% | -28.7% |
| 99356 | -49.3% | -46.1% | -45.8% | -48.3% | -45.4% | -51.3% | -50.9% | -50.2% | -53.5% | -49.6% |
| 99357 | 2.6% | 9.1% | 9.8% | 4.6% | 10.4% | -1.5% | -0.6% | 0.9% | -6.0% | 58.5% |
| 99358 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| 99361 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| 99362 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| 99371 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| 99372 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| 99373 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |

| Procedure Code | Marin | San Francisco | San Mateo | Alameda | Santa Clara | Ventura | Los Angeles | Anaheim | Rest of CA | Weighted Average |
|-----------------|--------------|---------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------|------------------|
| 99401 | 112.4% | 134.4% | 134.7% | 116.9% | 135.8% | 96.1% | 95.2% | 102.6% | 82.1% | 96.2% |
| 99499 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Pent Dif | 20.7% | 30.9% | 31.3% | 23.1% | 31.9% | 13.5% | 13.8% | 16.9% | 6.8% | 12.4% |

In general, the Medicare rates in Northern California are priced at a higher rate than those of Southern California or the “Rest of California.” Also, the differences among Medicare fee schedules are substantial. The average differences from OMFS to Medicare rates range from a high of 31.9% in Santa Clara to a low of 6.8% in the “Rest of California.”

To complete the estimate of system-wide changes on medical payments, the authors compared OMFS baseline payments to the estimated service payments under each of the ten alternative payment schedules. The resulting adjustment factors (represented by the “Percentage Difference” column) and estimated medical payment impacts for the ten scenarios are represented in Table Eight.

Table Eight. Potential Impact of Medicare Fees on Annual Medical Payments

| Fee Schedule | Percentage Difference | Estimated Annual E&M Payment | Increase in Est Annual E&M Payments |
|---------------------------------|-----------------------|------------------------------|-------------------------------------|
| 2005 OMFS | NA | \$508,250,000 | NA |
| Marin/Napa/San Francisco | 20.70% | \$613,457,750 | \$105,207,750 |
| San Mateo | 30.90% | \$665,299,250 | \$157,049,250 |
| Alameda/Contra Costa | 31.30% | \$667,332,250 | \$159,082,250 |
| Santa Clara | 23.10% | \$625,655,750 | \$117,405,750 |
| Ventura | 31.90% | \$670,381,750 | \$162,131,750 |
| Los Angeles | 13.50% | \$576,863,750 | \$68,613,750 |
| Orange | 13.80% | \$578,388,500 | \$70,138,500 |
| Rest of CA | 16.90% | \$594,144,250 | \$85,894,250 |
| Medicare Weighted Avg | 6.80% | \$542,811,000 | \$34,561,000 |
| | 12.45% | \$571,507,542 | \$63,257,542 |

The results show that applying any of the ten fee schedules to the injured worker population in California would result in higher E&M reimbursements. The estimated system-wide increases range from \$35 million more per year if the “Rest of California” fee schedule were applied uniformly across the state to \$162 million more when the Santa Clara region fee schedule were applied statewide. The regional adjusted Medicare weighted average would add an estimated \$63 million in E&M payments. Ventura County has a similar overall increase of 13.5% or \$69 million over OMFS payments.