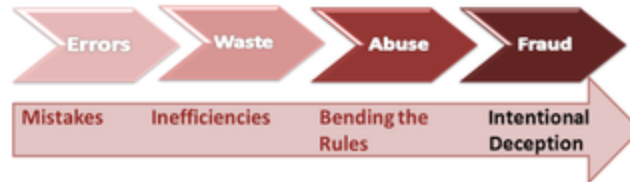


Causes of Improper Payments

- Not all improper payments are fraud, but all payments made due to fraud schemes are improper



- CMS is targeting all causes of improper payments
 - From honest mistakes to intentional deception
- Most common error is insufficient documentation