Swing for the Fences A Day of Learning Opportunities WPS. GOVERNMENT HEATH ADMINISTRATORS Learning Center Wpsphalearningcenter.com

- Thanks to AAPC of KC for inviting WPS GHA to share important Medicare information with you!
- Your presenters today are Ellen Berra, CPC and Mary E. Muchow
- Ellen and Mary are Specialists in Provider Outreach and Education (POE)
- There are multiple handouts for today's presentations
 - Shared with AAPC of KC in advance

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Disclaimer

This program was designed for informational purposes only. The current Medicare regulations will always prevail. The provider alone is responsible for correct submission of claims. Official Medicare Program provisions change frequently and are contained in the relevant laws, regulations and rulings and can be found on the Centers for Medicare & Medicaid Services (CMS) website at www.cms.gov.

W/PS	GOVERNMENT HEALTH ADMINISTRATORS
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- Please keep in mind this information may change at any time.

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Notes: We're Glad to Be Here! What is a "partnership"? CMS IOM, Publication (Pub) 100-09, Medicare Beneficiary and Provider Communications Manual, Chapter 6, Section 20.2 • Defines partnering entities • Lists examples of collaborative efforts • What should the partner do? · Please share this education and provide feedback





Today's Starting Lineup

- Targeted Probe and Educate Reviews and Findings
- Comprehensive Error Rate Testing (CERT) Findings
- Other Medical Review Contractors
- Office of Inspector General (OIG)/OIG Work Plan
- KS and MO Top Rejections/Denials
- WPS GHA Portal
- WPS GHA Learning Center

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Today's Closer

- Evaluation and Management (E/M) Services
 - Care Management
 - Shared/Split Services
 - Incident To
 - Global Services
- Infusion Services
- Welcome to Medicare Physical Examination/Annual Wellness Visit
- Certification of Home Health Services

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- Evaluation and Management (E/M) Services
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Targeted Probe and Educate (TPE)

- Instructions found in CMS IOM Pub 100-08, Medicare Program Integrity Manual, Chapter 3, Section 3.2.5.
 - Navigate to www.cms.gov>Regulations and Guidance>Manuals>Internet-Only Manuals (IOMS)>100-08>Chapter 3
- CMS TPE web page

WPS. GOVERNMENT HEALTH ADMINISTRAT

 Navigate to www.cms.gov>Research, Statistics, Data & Systems, Medicare Fee-for-Service Compliance Programs>Medical Review and Education>Targeted Probe and Educate (TPE)

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Selection and Announcement of TPE Topics

- List available on WPS GHA Portal
 - Part A
 - Part B
- Includes ongoing and new TPE topics



TIP: WPS GHA Portal resources also include guidelines for successful review, and checklists for documentation

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- Specific to analysis of MAC data
- Topics require CMS approval
- When TPE review is authorized by CMS, WPS GHA will publish
 - Notice in Claim Review News and Updates
 - Documentation guidance for successful review in Claim Review Guides and Resources (linked from notice in News and Updates)
 - Publish a documentation checklist

Continuing J5 Part B WPS GHA TPE Topics

- Hyperbaric Oxygen (HBO)
 - CPT code 99183
- Outpatient E/M Services
 - CPT codes 99211-99215
- Inpatient E/M Services
 - CPT codes 99221-99223
- Emergency Room Visit
 - CPT codes 99281-99285

New J5 Part B WPS GHA TPE Topics

- Outpatient Therapy Therapeutic Procedure
 - CPT code 97110
- Rituximab
 - HCPCS code J9310, J9312, and J9313

Notes	•		





How does TPE work? If chosen for the program, you will review 20-40 of your claims and supporting medical records. You will be given at least a 45-day period to make changes and improve. If some claims are denied, you will be invited to a one-on-one education session. **MACa may conduct additional review if significant changes in provider billing are defected. **WPS_GOVERNMENT ADMINISTRATIONS**

- If chosen, you will receive a letter from your MAC
 - · Most providers will never be on TPE
- MAC will review 20-40 of your claims and supporting medical records
- If compliant, you will not be reviewed again for at least 1 year for the selected probe/topic
- Regardless of whether there are findings or if all claims in the TPE probe are paid, you will be invited to a one-on-one education session
 - WPS GHA provides this via teleconference
 - You will be given at least a 45-day period to make changes and improve
- Next round of TPE begins in 45 days
 - From date of education session, or
 - · From date education session was refused

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What happens if there's no correction?

- A provider may undergo up to three rounds of education sessions
- Failure to improve will result in referral to CMS for other considerations

WPS.	GOVERNMENT HEALTH ADMINISTRATOR:
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- A provider may undergo up to three rounds of education sessions
 - WPS GHA will determine which providers need additional rounds
 - Based on 20% error rate
 - Round 2 starts 45 days from one-on one education session or the date the one-on-one education session was refused
- Failure to improve will result in referral to CMS for other considerations
 - 100 percent prepay review
 - Extrapolation
 - Referral to Recovery Auditor

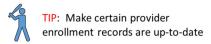
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Questions You Might Ask

- How will you know you are selected for review?
- What happens after you receive notification for TPE?



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How will you know you are selected for review?

- · You will receive a phone call from WPS GHA
 - To establish a point of contact
 - For all contact, except for the notification letter
- The notification letter from WPS GHA contains specifics of the probe
 - Sent via U.S. Mail to the Pay To address on the provider profile (in PECOS)

What happens after you receive notification of your selection for TPE?

- Be alert and wait for Additional Documentation Requests (ADRs)
- When the ADR is received
 - Completely review ADR to identify all needed information/supporting documentation for probe review
 - Documentation may be housed elsewhere; you are responsible for provision of records for the probe review

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Sending Documentation to WPS GHA

- Reminders
- Five methods for submission



TIP: The provider on TPE is responsible for accessing and sending all needed medical records, regardless of where record is stored

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- Reminders
 - Include a copy of the ADR letter
 - Submit within 45 days of ADR notification
- Five methods for submission
 - Resource available on WPS GHA Portal
 - Navigate to Claim Review Topic Center>Guides and Resources>Responding to a Medical Review Additional Documentation Request (ADR)

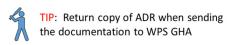
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Methods to Submit Documentation to WPS GHA

- WPS GHA Portal
- Hardcopy
- Fax
- CD
- esMD



Notes	5:			

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- WPS GHA Portal
 - Best, fastest
 - File size limitation is 15 MB
 - Can split files to accommodate file size limitations
- Hardcopy
 - Submit individual files clipped together, no staples
 - Full size sheets, single sided
 - Refer to WPS GHA portal resources for additional information on hard copy submission
 - Claim Review Topic Center
- Fax
- Fax number included on WPS GHA portal
- Fax each request individually
- · Full size sheets, single sided
- CD
- Images must be in PDF or multipage TIF format
- May submit multiple ADR requests on 1 CD, each must be separate PDF or TIF
- ADR must be first item under each file
- Must be password protected, password must be sent to secure email listed on portal
- Follow all directions on WPS GHA portal
 - Claim Review Topic Center
- esMD
 - · Follow information, as directed on WPS GHA portal
 - Claim Review Topic Center





MR Denial - Documentation Not Returned Timely

- Remittance Advice Remark Code M27
- Those who refuse to submit documentation
 - referred to CMS



TIP: M27 on the Remittance Advice means you may submit a new claim with documentation

Notes:

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- · Part B Claims
 - Remittance Advice Remark Code will be M27
 - Submit new claim with documentation
- Providers who refuse to submit documentation are referred to CMS

		 	
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What happens when WPS GHA receives the documentation?

- Nurse analyst reviews documentation as it is received
- Nurse analyst will contact you, if needed
- Nurse analyst will offer/provide one-on-one education



TIP: Take advantage of one-onone education, when offered

WPS. GOVERNMENT HEALTH ADMINISTRATOR:

- · Nurse analyst reviews documentation as it is received
- Nurse analyst will contact you, if needed
 - Additional needed documentation
 - Issue that can be resolved easily during the ongoing review
- If denied, nurse analyst will provide one-on-one education
 - Guidance on how to avoid or fix findings for future reviews

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Help Yourself

- Access individual claim review (ICR) result
 Use WPS GHA portal
- Implement needed changes to comply with Medicare guidelines
- If you disagree with the ICR result, prepare and submit a timely and complete appeal request



TIP: No need to wait until end of round to implement needed changes

Notes:

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- Results of all completed individual claim reviews (ICRs) are available in the WPS GHA portal
 - Log in often to view results and implement needed change as the TPE process moves along
- Prepare and submit request for appeal, if you disagree with review findings
 - Be cognizant of timeframe (120 days from date of denial decision)

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MAC Relationship in Claim Reviews CERT WPS RAC GHA OIG UPIC

Notes:			

MAC	notified	of review	<i>i</i> findin	gs				 	

- Claim adjudicated based on findings
 Remittance Advice generated
 - Issue payment or recover —————

Claim Review Contractors

- Comprehensive Error Rate Testing Contractor
 - CERT
- Recovery Audit Contractor
 - RAC
- Unified Program Integrity Contractor
 - UPIC
- Supplemental Medical Review Contractor
 - SMRC

Department of Health and Human Services Medicare Claim Review

- Office of Inspector General
 - OIG





CERT Contractor • AdvanceMed Corp. • https://certprovider.admedcorp.com/ Provider Documentation Information Responsibilities • Collect documentation and perform reviews on a statistically-valid random sample of Medicare Fee-for-Services (FFS) claims • Produces an annual improper payment rate • Measures performance of MACs • Provides insight into cause of errors • Evaluates/determines MAC education

• Claim is selected via statistically valid random

Documentation is reviewed to determine if the claim

CERT contractor shares review results with MAC If an error is assessed, the MAC will adjudicate the claim and issue payment or request an overpayment

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Notes:



Review Process

sampling

· Documentation is requested

was processed correctly



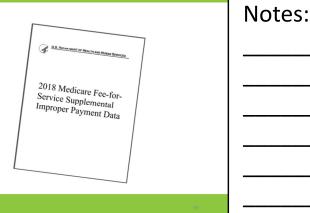
Recent J8 Part B CERT Errors - Swing and a Miss • Insufficient documentation - 66% • Service incorrectly coded - 26% • No response • Medically unnecessary service(s)/treatment WPS GHA Part B CERT Error Findings (4th Quarter Calendar Year 2018) • Insufficient documentation • 66% · Service incorrectly coded • 26% No response • 6% • Medically unnecessary service(s)/treatment • 1% Other

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CMS CERT Report



- Summary of high level findings
- Common causes of improper payments
- Monetary loss findings
 - Projected improper payment by state
- Detailed information
- More

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Jurisdiction Error Rate Contribution Data 2015 AIB MAC Error Rate Contribution Score 2016 AIB MAC Error Rate Contribution Score 2016 AIB MAC Error Rate Contribution Score 2016 AIB MAC Error Rate Contribution Score 2017 AIB MAC Error Rate Contribution Score

- Available on CMS web page by same name
- Key variables are the jurisdiction's
 - Improper payment rate
 - Share of national improper payments

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Appeal a CERT Error

• Submit to WPS GHA



WPS GOVERNMENT

- Send completed request for appeal to the MAC, not to the CERT contractor
 - Complete form
 - Sign it/date it
 - Submit all necessary documentation
- For greater efficacy, submit the appeal request via WPS GHA's transactional portal

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Notes: **RAC** • Region II – Cotiviti, LLC (Includes IA, KS, MO and NE) – https://www.cotiviti.com/markets/cms-rac COTIVITI Responsibilities • Identify underpayments/overpayments, as part of the **Recovery Audit Program** • RAC publishes all CMS-approved issues before review commences Review performed Unique to circumstances · Vulnerabilities identified by data analysis CERT program findings RAC sends letter to notify provider of review findings • Outlines any improper payments References reason for denial MAC role in RAC review Issues overpayment demand letter · Conducts first level of appeal, if requested Can answer only general questions regarding the RAC program • Contact Recovery Auditor (RA) with specific questions





Notes: **UPIC** AdvanceMed – https://www.nciinc.com/about-us/ advance • Responsibilities • Identify cases of suspected fraud and take appropriate corrective actions Review performed Unique to circumstances Potential outcomes • Identify need for administrative actions • Prepayment/auto-denial edits to be implemented by MAC Payment suspension Expanded review Referral to law enforcement • Consideration of civil/criminal penalties





SMRC

Noridian Healthcare Solutions, LLC
 https://www.noridiansmrc.com/



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Responsibilities

- Conduct nationwide medical review as directed by CMS in order to
 - Lower improper payment rate
 - Increase efficiencies of medical review functions of the Medicare and Medicaid programs

Project review types

- Healthcare Fraud Prevention Partnership (HFPP) support review
- · Program Integrity (PI) support review
- Provider Compliance Group (PCG) review
 - Increase efficiencies of medical review functions of the Medicare and Medicaid programs

Current projects

· Listed on SMRC website

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Office of Inspector General (OIG) | Control |

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Found at https://oig.hhs.gov/

OIG Mission

- To protect the integrity of Department of Health & Human Services (HHS) programs as well as the health and welfare of program beneficiaries.
 - Six components to carry this out
 - Immediate Office of Inspector General (IO)
 - Office of Audit Services (OAS)
 - Office of Evaluation and Inspections (OEI)
 - Office of Management and Policy (OMP)
 - Office of Investigations (OI)
 - Office of Counsel to the Inspector General (OCIG)

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OIG Work Plan Active Work Plan Items Work Flan Items (Work Plan Items) Work Flan Items (Work Plan Items) This its reflects Of audit, evaluation, and impection that are underway or planned, You may search the creties contents of the Active Work Plan Items and corresponding summaries in the search bar. For a summary of a particular work Plan Items (Active Work Plan Items) Show at of entries Amounted of Review (Plan Items) Amounted of Review (Plan Items) Agency Title January 2019 Centers for Medicare Symmetric for Clinical Displaced, Labourity Plant Item 2018 January 2019 Centers for State of Complete State (Complete State Stat

What is the OIG Annual Work Plan?

- Sets forth various projects underway or planned to be addressed during the fiscal year and beyond by OIG's Office of Audit Services and Office of Evaluation and Inspections
 - · Review of multiple HHS agencies
 - Includes the Centers for Medicare & Medicaid Services

Web-Based Work Plan

- Searchable list of all OIG audits, evaluations and inspections underway or planned
- Updated monthly

Published Reports

- Access on OIG's What's New page
 - · Includes recommendations to CMS
 - CMS will respond, potentially resulting in claim review

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Example of Why a Service Was Chosen for Medical Review

Hyperbaric Oxygen Therapy (HBOT)

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• Hyperbaric Oxygen Therapy (HBOT)

Notes:			
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OIG Selected WPS GHA for Review

- Based on data
- Objective to determine if HBOT complied with regulations



WPS. GOVERNMENT HEALTH ADMINISTRATOR:

Office of Inspector General (OIG) HBO Review of WPS GHA

- Objective of review was to determine HBO complied with regulations
- Review by OIG was before the prior authorization demo of 2015
- WPS GHA (J5) was selected due to high volume of claim processing

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OIG Claim Sample

- 44,940 claims = \$59.5 M for J5
 - 73 providers
- Sampled 120 claims
 - 102 claims did not comply with Medicare regulations, representing \$300,789 in inappropriate payment
 - Estimated overpayment applicable to universe of claims = \$42.6 M

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• This slide includes information on the OIG claim sample.

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OIG Findings

- Documentation did not substantiate
 - Medical necessity
 - Covered condition
 - Standard or conventional wound care was provided prior to HBOT
 - Any mention of Wagner Grade III or higher diabetic wound

National Coverage Determination (NCD) 20.29

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- Documentation did not substantiate
 - Medical necessity for service
 - Services provided for a condition that is covered
 - Documentation of standard or conventional wound care prior to services
 - Documentation of Wagner Grade III or higher diabetic wound





Old Recommendations/WPS GHA Response Topic Center My Account Contact Us Topic Center My Account Center Us Topic Center My Account Contact Us Topic Center My Account Center Us Topic Center My Account Center Us Topic Center My Account Center Vision Contact Us Topic Center My Account Center Vision Cen

- Recover the appropriate portion of the \$300,789 identified overpayments
 - Response: WPS GHA recovering identified overpayments
- Notify providers responsible for the 44,820 non sampled claims to investigate and return any overpayments (estimated \$42.3M)
 - Response: WPS GHA sent notification letters to affected providers and suggested they investigate/return overpayments
- Identify and recover any improper payments made after audit period
 - Response: WPS GHA initiated TPE reviews on at-risk providers

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Notes:

Claim Rejections/Claim Denials

Missouri and Kansas; Dates of Service 10/01/18 – 12/31/18; Processed thru 01/09/19

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Data Analysis Performed

- Kansas, Missouri
- Dates of service 10/01/18 12/31/18
- Processed thru 01/09/19

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Rejections/Unprocessables

- Defined in CMS IOM Pub 100-04, Chapter 1, Section 80.3.1
 - Claim with
 - Incomplete or missing required information
 - · Complete information, but information is invalid
 - May be required on all claims, or required conditionally
- Remittance Advice Remark Code MA130
- No appeal rights
 - Fix it, resubmit it

WPS. GOVERNMENT HEALTH ADMINISTRATOR:

- "Unprocessable" defined by CMS in IOM Pub 00-04, Chapter 1, Section 80.3.1
 - A claim that is incomplete or missing information or a claim that is complete, but information is invalid
- Remittance Advice Remark Code MA130
 - Additional remark code will identity what must be corrected before resubmitting the claim
 - No appeal rights

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Top Rejections • Handout	Notes:
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Please refer to the handout.	





Denials

- Review RA for information
- Remittance Advice (RA) Information An Overview
- Self service denial assistance is available
 - If you use the WPS GHA Portal Claim/Inquiry feature, use the More Info button
 - Navigate to Topic Center>>Self-Service and select Denial Assistance to view table with Part B claim categories with enhanced denial information
- Appeal rights appear on the RA
 - Consider CER process to make a basic correction, in lieu of an appeal

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- · Common denials are attributed to
 - Duplicate claims/services
 - Coverage/Entitlement
 - Medical Necessity
 - Payer/Contractor issues
 - Bundling
 - Medicare Secondary Payer situations
 - More
- Use WPS GHA Portal Claim/Inquiry feature for details on denials
 - Choose More Info button
- Refer to CMS booklet for details on the RA
 - Remittance Advice (RA) Information An Overview

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Clerical Error Reopening (CER)

- How to Request a Clerical Error Reopening
 - Portal resource includes what qualifies for CER
- Methods
 - Telephone
 - Fax
 - Written
 - WPS GHA Portal (fastest and preferred method)
 - WPS GHA Transaction Portal Manual includes instructions

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- Process to make minor correction to previously processed claim
- Can be accomplished by
 - Telephone
 - Fax
 - Written request
 - WPS GHA Portal (fastest/preferred)
 - Portal User Manual includes instructions

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Top Denials	Notes:
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WPS GHA Portal



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- WPS GHA Portal
 - www.wpsgha.com
 - Public side
 - Transactional side
- Topic Centers for easy navigations
- Frequently Asked Questions
 - Searchable
- Please continue to periodically complete the ForeSee Website Satisfaction Survey when it presents itself

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WPS GHA Learning Center WPS GOVERNMENT HEALTH ADMINISTRATORS Learning Center Register Now

- WPS GHA Learning Center
 - http://wpsghalearningcenter.com/
- Find
 - In Person Events
 - Teleconferences
 - Webinars
 - MAC Collaborations
 - On-Demands
 - Questions and Answers from numerous WPS GHA education events/opportunities

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Review

- What is the combined total number of years of Medicare experience for Mary and Ellen?
- For the TPE process, how many rounds of education may occur?
- What is the OIG Hotline Number?
- In what year was "Take Me Out to the Ballgame" released?

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Do you know the answers?

• Please write your answers down

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Notas:





X1 Continuous, Broad X2 Continuous, Focused X3 Episodic, Broad X4 Episodic, Focused X5 Ordered by others

X1 – Continuous, broad service

For reporting services by clinicians who provide the principal care for a patient, with no planned endpoint of the relationship. Services in this category represent comprehensive care, dealing with the entire scope of patient problems, either directly or in a care coordination role.

X2 – Continuous, focused service

For reporting services by clinicians whose expertise is needed for the ongoing management of a chronic disease or a condition that needs to be managed and followed for a long time.

X3 – Episodic, broad service

For reporting services by clinicians who have broad responsibility for the comprehensive needs of the patients, that is limited to a defined period and circumstance, such as a hospitalization.





	Notes:
For reporting services by specialty focused clinicians who provide time-limited care. The patient has a problem, acute or chronic, that will be treated with surgery, radiation, or some other type of generally time-imited intervention. KS – Only as ordered by another clinician For reporting services by a clinician who furnishes care to the patient only as ordered by another clinician. This patient relationship category is reported for patient relationships that may not be adequately captured in the previous four categories. The use of these modifiers is voluntary for services January 1, 2018 and after for those providers eligible for the Quality Payment Program (QPP) and Medicare Incentive Payment System (MIPS) Other practitioners may also submit CMS may use these modifiers to adjust payments, either through the fee-for-service or QPP/MIPS, in the future CMS has a presentation on this from a webinar provided in October 2018	





Notes: **Evaluation and Management Services** 40% Total Services 20% Office and other outpatient • E/M services are approximately 40% of allowed charges under the Physician Fee Schedule • Office or other outpatient services are approximately 20% of allowed charges • There are three ways to document to choose a level of service The 1995 Documentation Guidelines The 1997 Documentation Guidelines • Time Elements in medical record for new and established office or other outpatient visits • Providers will no longer be required to re-enter information in the patient's medical record Provider will be required to review what they believe is clinically appropriate • Identify any new, changed, updated, information Notate the review in the medical record CMS is not implementing the primary and specialty care add-on codes





Teaching Physician

 The teaching physician presence for E/M services and procedures may be documented by the teaching physician, the resident, or the nurse

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Home Medical necessity of service Separate medical necessity for in-home not required

- Services require the medical record to show the medical necessity for seeing the patient
- The final rule indicates that for services after January 1, 2019, there would not be a separate medical necessity requirement for seeing the patient in the home instead of the office or clinic setting
 - CMS has not changed IOM, Pub 100-04, Claims Processing Manual, <u>Chapter 12</u>, Section 30.6.14.1 as of the date of completion of this document

Notes:			
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Virtual Check-In

WPS GOVERNMENT HARITHANDERS
Virtual check-in - G2012 Real-time interaction with billing provider Does not apply to ancillary staff Not subject to any geographic location restrictions Not related to a previous E/M service within 7 days or within 24 hours or the next available appointment following the service The patient has to give verbal consent as they have cost sharing responsibilities Reminder – provider cannot waive cost sharing across the board Purpose is the determination of whether the patient needs a visit There are no frequency limitations





Remote Pre-recorded



14/50	GOVERNMENT
MPSI	GOVERNMENT HEALTH ADMINISTRATOR:
	ADMINISTRATOR

- New service G2010
- Not within 7 days of previous related E/M service or within 24 hours or the next available appointment of E/M
- Physician or NPP looking at pictures, video, etc. of what patient has taken and determining medical decision-making
- The physician or NPP would follow up with the patient within 24 hours
 - Documentation what was viewed, clinical assessment, and follow-up with patient
 - Follow up can be e-mail, telephone, text, etc.
 - If video or photos not clear, the practitioner must contact the patient

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Interprofessional Internet Consult 99452 Ordering 99449 99441 99447 PDS GOVERNMENT HEADMINISTRATORS

- This is conversation or interaction between the patient's physician and a consulting physician
- These are time-based codes
- There are two sets of codes
 - Person requesting the consult 99452
 - Consultant 99446 99449, and 99451
- Need patent consent
- Patient has cost sharing
- Documentation
 - Treating physician medical record necessitating the need for the consult and the consultation report
 - Consulting physician medical record showing the medical necessity, the request, and the consultation report

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Chronic Care Remote



MADE	GOVERNMENT HEALTH ADMINISTRATORS
VVP5.	ADMINISTRATORS

- Payment will now be allowed for code 99453, 99454, 99457
 - 99453 patient set up and instruction
 - Professional time
 - Cannot be provided as an incident to service
 - 99454 daily or programmed alerts
 - Billable every 30 days
 - Professional time
 - 99457 20 minutes or more of clinical staff, MD/DO or NPP time during the month
- Will require beneficiary consent
- Beneficiary will have cost sharing

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Telehealth

- New prolonged preventive
- Dialysis assessment
 - Face-to-face
 - One per month first three months
 - · At least once every three consecutive months
- Acute stroke Modifier G0 (zero)
 - Home
 - Mobile stroke unit

WPS. GOVERNMENT HEALTH ADMINISTRATOR

- G0513 and G0514 These are prolonged preventive care services
 - Billable with appropriate preventive service available by telehealth
- Home dialysis clinical assessments
 - Face-to-face
 - One visit per month for the first three months of home dialysis
 - One visit every three consecutive months thereafter
 - The patient's home can be an originating site, but cannot submit a fee
 - A renal dialysis facility can be an originating site and can submit an originating site fee
- Patients with an acute stroke
 - Removes the rural restriction
- Applies to the current list of originating sites
- Adds a mobile stroke unit
 - Definition a mobile unit that furnishes services to diagnose, evaluate, and/or treat symptoms of an acute stroke
 - The mobile unit may not submit an originating site fee
 - Both the originating and distant site practitioner will add modifier G0 (zero) to the procedure code

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Split/Shared Services NPP MD/DO Documentation WPS GOVERNMENT HARTH H

- Both parties perform a portion of the service
- Need signature from both parties
- Best practice is for both to document what they performed
- Appropriate place of service
 - Office
 - Must also meet Incident to guidelines
 - Outpatient
 - Inpatient
- Inappropriate
 - Nursing facility
 - Critical care services

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Frofessional? Confice? Confice Plan of care? Confice Plan of care Plan o

- Documentation should support the questions above
- Professional service
 - E/M
 - Drugs and biologicals
 - Ancillary staff
 - Minor procedures
- Office location
- Employment relationship
- Plan of care
- Supervision

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Global Surgery Package 24 25 Documentation WPS GOVERNMENT HARTHANDERS Documentation

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•	Services provided by the same physician or a member	
	of the same group with the same specialty	

- E/M is reimbursed as part of the procedure
 Determine the number of global days
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- Determine if your service meets an exception as identified by a Modifier
- Modifier 24 unrelated during the post-operative period
- Modifier 25 Significant, separately identifiable
 Modifier 57 Decision for major surgery
- Clearance for surgery





Welcome to Medicare

•	Beneficiary	history

- Assess for depression
- Functional ability and level of safety
- Exam
- End of life planning
- Education
- Preventive services

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- Submitted by only one physician
- Health risk assessment
- Medical and family history
- Establish list of providers
- Measurements
- Cognitive impairments
- · Depression screening
- Functional status and level of safety
- Written screening schedule
- · Risk factors
- Personalized health advice
- · Advanced care planning

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Infusion Services Hvdration • Therapeutic, prophylactic, and diagnostic injections and infusion (excluding chemotherapy) Chemotherapy

WPS.	GOVERNMENT HEALTH ADMINISTRATORS		

- Hydration (normal saline, D5-W, etc.)
- Therapeutic, prophylactic, and diagnostic injections and infusion (excluding chemotherapy)
 - Multiple included services
 - Procedure 90772 and CPT
 - Do not use 99211 when nonsupervised
 - If non-supervised, the service is nonpayable
- Chemotherapy
 - Coding article A54176 has list of codes considered chemotherapy (not all inclusive)
- Submit only one initial code
 - Exceptions
 - Protocol requires two IV sites
 - · Services provided during different patient encounters
 - Use Modifier 59
- Documentation
 - · Plan of care including drug, dosage, and route of administration
 - Who performed
 - · Who supervised

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CCM Procedure Codes

- 99490 20 minutes
 - At least 15 minutes documented
- 99487 60 minutes
 - At least 60 minutes documented
- 99489 each additional 30 minutes in addition to 99487
 - At least 30 minutes documented
- Cannot report both CCM and Complex CCM in the same month

WPS GOVERNMENT
HEALTH
ADMINISTRATOR

Please refer to the handout.

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Notes: **Practitioner Eligibility** • MD/DO • CNM • CNS • NP • PA Please refer to the handout.





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Clinical Staff	Notes:	
Incident toGeneral supervision		
 Clinical personnel Time by non-clinical staff does not count toward the CCM requirements 		
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WPS. GOVERNMENT HEALTH ADMINISTRATORS		
Please refer to the handout.		





Patient Eligibility	Notes:
Two or more chronic conditions	
Expected to last 12 months or until deathSignificant risk	
WPS. GOVERNMENT HEALTH ADMINISTRATORS	
Please refer to the handout.	





Examples of Chronic Conditions Condition Condition Alzheimer's Arthritis Asthma Atrial Fibrillation Autism Spectrum Disorders Cancer Cardiovascular Disease Chronic Obstructive Pulmonary Disease Depression Diabetes Hypertension Infectious Diseases such as HIV/AIDS Please refer to the handout.

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Notes: **Initiating Visit** • Patient seen within one year • Procedure code G0506 - Extensive assessment and care planning - Outside of care described by initiating visit - Billable only once WPS. GOVERNMENT HEALTH ADMINISTRATOR Please refer to the handout.





Notes: **Patient Consent** • Patient must consent Patient has cost-sharing • Documented in medical record - Availability and cost-sharing - Only one practitioner may submit - Right to stop services effective at end of month WPS. GOVERNMENT HEALTH ADMINISTRATO Please refer to the handout.





Notes: **Elements** • Structured recording of patient health • Comprehensive electronic health plan • Manage transitions of care • Coordinate and share information Patient-centered • Provide a copy to the patient WPS. GOVERNMENT HEALTH ADMINISTRATORS Please refer to the handout.





Notes: Comprehensive Care Plan • Problem list • Expected outcome and prognosis • Measurable treatment goals • Symptom management • Planned interventions • Medication management • Schedule for review and/or revision WPS. GOVERNMENT HEALTH ADMINISTRATORS Please refer to the handout.





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Access to Care	Notes:
 24/7 access Where does the patient contact? Who does the patient contact? 	
– How does the patient contact?	
WPS GOVERNMENT HAMITH H	
Please refer to the handout.	J
ricase refer to the handout.	





Comprehensive Care Management Assessment of patient needs System-based approaches to receive preventive services Medication reconciliation and documentation of adherence and potential interactions Oversight of patient self-management Coordinating community resources Manage transitions of care

WPS. GOVERNMENT HEALTH ADMINISTRATO

Please refer to the handout.

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Notes: **Concurrent Billing** • Cannot provide during - Care plan oversight for home health or hospice - End-stage renal disease services Same time as TCM Prolonged E/M WPS. GOVERNMENT HEALTH ADMINISTRATOR Please refer to the handout.





	Notes:
Service Summary	Notes.
What to includeWhat to document	
WPS GOVERNMENT HEALTH ADMINISTRATORS	
Please refer to the handout.	





TCM Procedure Codes

- \bullet 99495 Moderate medical decision-making with face-to-face within 14 days
- 99496 High medical decision-making with face-to-face within 7 days

WPS	GOVERNMENT HEALTH ADMINISTRATOR

Please refer to the handout.

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Services

- Interactive contact
- Non-face-to-face
- Face-to-face

WPS GOVERNMENT
HEALTH
ADMINISTRATOR

Please refer to the handout.

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Who Can Perform WPS. GOVERNMENT HARRING ADMINISTRATORS

Please refer to the handout.

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Discharge



WPS. GOVERNMENT HEALTH ADMINISTRATOR

Please refer to the handout.

Notes:		
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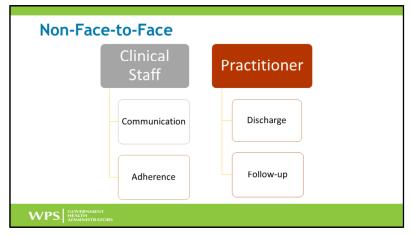
Interactive Contact WPS GOVERNMENT HALLIM ADMINISTRATORS

Please refer to the handout.

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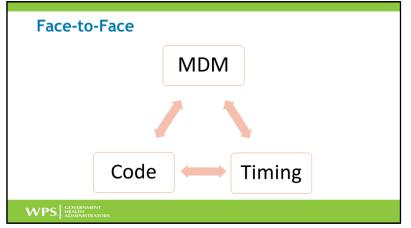


Please refer to the handout.

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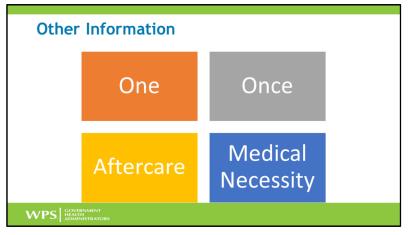


Please refer to the handout.

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Please refer to the handout.





Medicare Home Health Benefit

- Medicare Part A and/or Part B and section 1814(a)(2)(C) and section 1835(a)(2)(A) state that when the physician refers a patient to HH, the patient must:
 - Be confined to the home
 - Need skilled services
 - Be under the care of a physician
 - Receive services under plan of care (POC) established and reviewed by a physician
 - Have had a FTF encounter for their current diagnosis with a physician or allowed non-physician practitioner (NPP)

WPS. GOVERNMENT HEALTH ADMINISTRATORS

The patient/beneficiary must:

- 1. Be confined to the home
- 2. Require "skilled" services
- 3. Remain under the care of a physician
- 4. Receive services under a POC established and reviewed by a physician
- 5. Must have had a FTF encounter for their current diagnosis with a physician or NPP

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Notes: **Homebound Status Criteria One**One Standard Must Be Met **Criteria Two** Both Standards Must Be Met There must exist a normal inability to leave Because of Illness or injury, need the aid of supportive devices such as crutches, canes, wheelchairs and walkers; the use of special transportation; or the assistance of another person to leave their place of residence. OR AND Have a condition such that leaving his or Leaving home must require a considerable and taxing effort. her home is medically contraindicated. WPS. GOVERNMENT HEALTH ADMINISTRATE

	Patient must meet both Criteria One and Criteria Two	
	Patient must meet both Criteria One and Criteria Two	
•	Include information about the injury/illness	
•	The type of support and/or supportive	

device/assistance required Detailed information on how current condition makes

- leaving home contraindicated Describe normal inability to leave home
- Describe the "considerable and taxing" effort

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Medicare HH Benefit

- The six home health disciplines included in the 60-day episode rate are:
 - Skilled Nurse on an intermittent/part-time basis
 - Home Health aides on an intermittent/part-time basis
 - Physical Therapy
 - Occupational Therapy
 - Speech Language Pathology
 - Social Work

WPS. GOVERNMENT HEALTH ADMINISTRATOR

- Services that the Medicare Patient/Beneficiary may receive at home include:
 - Skilled Nurse on an intermittent/part-time basis
 - Home Health aides on an intermittent/parttime basis
 - Physical Therapy
 - · Occupational Therapy
 - Speech Language Pathology
 - Social Work

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Plan of Care, Under the Care of a Physician

- The patient must be under the care of a physician who is qualified to sign the physician certification and plan of care in accordance with 42 Code of Federal Regulations (CFR) 424.22.
- It is expected that in most instances, the physician who certifies the patient's eligibility for Medicare home health services will be the same physician who establishes and signs the plan of care.

WPS. GOVERNMENT HEALTH ADMINISTRATORS

- Certifying must be MD/DO
- MD/DO following patient in the home
- May be other than the ordering physician

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Face-to-Face Encounter

- A FTF encounter with the patient must be performed by the certifying referring physician himself or herself, a physician that cared for the patient in the acute or post-acute care facility or an allowed Non Physician Provider — NP, PA, CNM, CNS
- There are no forms required just your clinical note

WPS. GOVERNMENT HEALTH ADMINISTRATOR

- Face-to-face encounter must occur within 90 days prior to or 30 days after the start of care
- Must be for the same reason as necessitating home health care
- · Can be by NPP
 - Ordering physician can utilize another practitioner's notes
- Clinical note must support the order for home health care

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Certification: Example of a Complete Certification Statement

• I certify this patient is confined to his/her home and needs intermittent skilled nursing care, physical therapy and/or speech therapy, or continues to need occupational therapy. This patient is under my care, and I have authorized the services on this plan of care, and will periodically review the plan. I further certify this patient had a face-to-face encounter that was performed on xx/xx/xxxx by a physician or Medicare allowed non physician practitioner that was related to the primary reason the patient requires home health services.







Certifying is not following patient

• I certify this patient is confined to his/her home and needs intermittent skilled nursing care, physical therapy and/or speech therapy, or continues to need occupational therapy. I have authorized the services on this initial plan of care which will be further developed by Dr. XXX who is overseeing the home health services. I further certify this patient had a face-to-face encounter that was performed on xx/xx/xxxx by a physician or Medicare allowed NPP that was related to the primary reason the patient requires home health services.



- · Shows patient is homebound
- Shows they need skilled services
- Shows who is going to follow the patient
- Shows the date of the face-to-face service





Recertification

- Recertification is required at least every 60 days
- Medicare does not limit the number of continuous episode recertifications for patients who continue to be eligible for the HH benefit
- The physician recertifying the patient's eligibility is the physician that has been monitoring the POC and providing oversight of HH services

WPS GOVERNMENT HEALTH ADMINISTRATOR

- · Does not require a face-to-face service
- Documentation will show patient meets the criteria
- Recertification is required at least every 60 days
- Provided by physician that has been monitoring the plan of care and providing oversight

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Physician Billing

- G0180 Certification
- G0179 Re-certification
- G0181 Care Plan Oversight

Notes:

WPS GOVERNMENT HEALTH

- G0180 Certification
 - When the physician is attesting to the patient meeting the requirements
- G0179 Re-certification
 - When the physician is attesting to the patient still meeting the requirements
- G0181 Care plan oversight
 - The physician has provided at least 30 minutes of clinical oversight

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Notes: Who's on first? What's on second? Things You Need to Know WPS GHA Departmental Items of Significance Appeals Claims Payment Recovery • Provider Enrollment CMS MAC Satisfaction Indicator (MSI) Survey • Available March 2019 • Share feedback about your experience with WPS GHA directly to CMS







Thank You You knocked it out of the park!

WPS. GOVERNMENT HEALTH ADMINISTRATORS

Do you have a follow up question?

- For a period of ten days, you may send presentation related questions to aapcofkc@gmail.com..
 - Claim specific questions and those not presentation-related must be handled by Customer Service

Thank You

- Please be certain to provide feedback to AAPC of KC
- This helps assure future WPS GHA participation in partner endeavors

Notes:			
	 		
			
	 		
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