

American Academy of Professional Coders

CODING edge

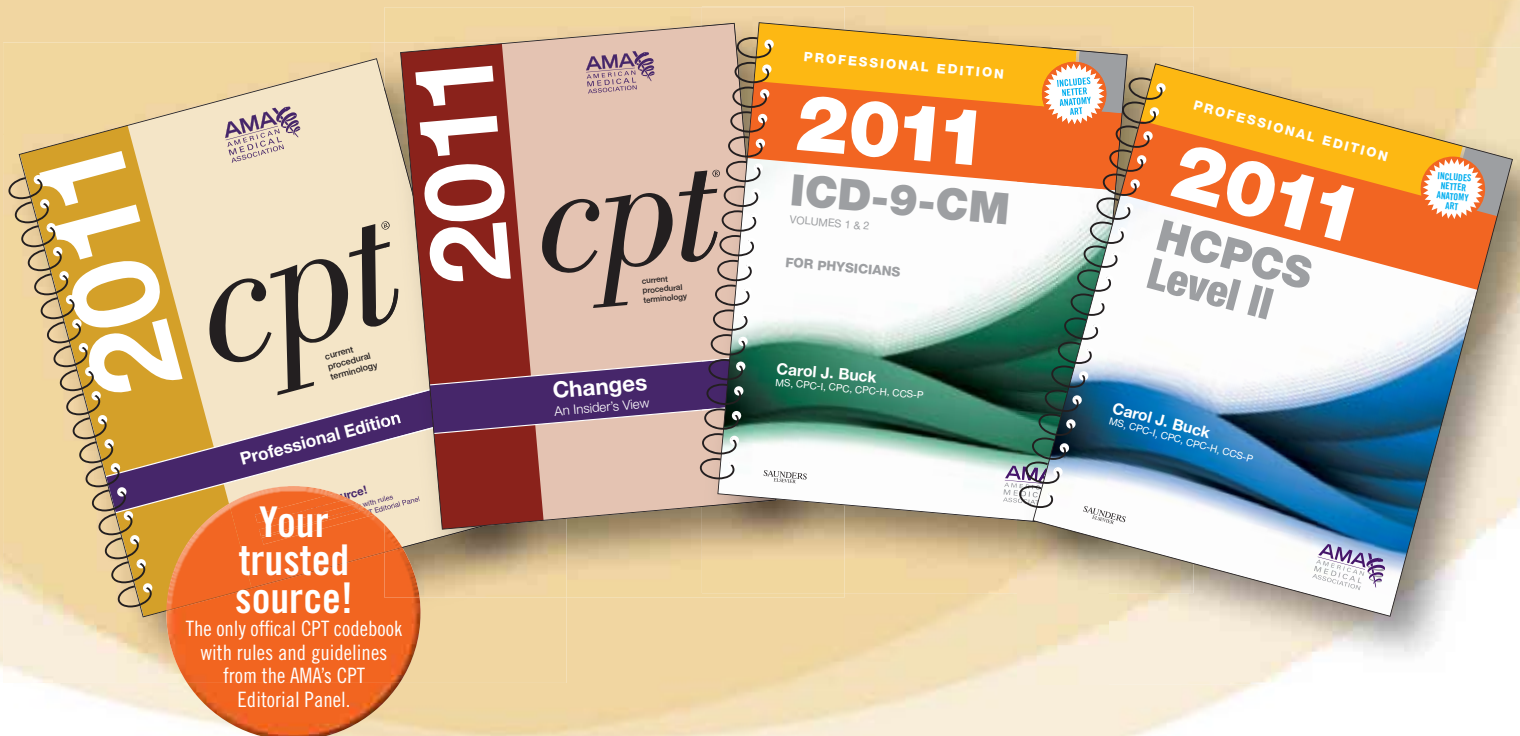
April 2010

Lives Enhanced by Coding

Jacqueline J. Stack,
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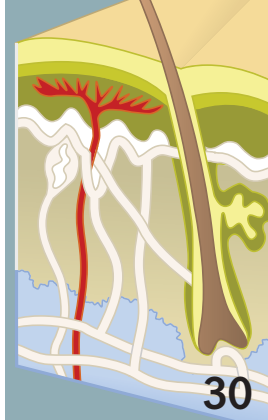
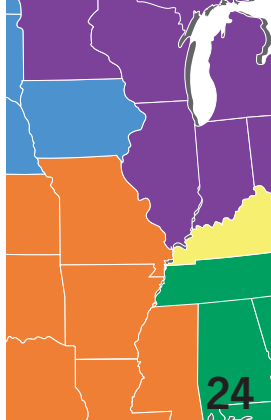
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April 2010

[contents]



Features

- 12 Identify and Target Correct Neuro Radiosurgery Codes**
Janice G. Jacobs, CPA, CPC, CCS, ROCC
- 14 Pinpoint Common Chiropractic Coding Modality Errors**
Michael D. Miscoe, JD, CPC, CASCC, CUC, CHCC, CRA
- 18 Take Four Steps Toward Preventive Medicine Coding Success**
Beverly Welshans, CPC, CPC-I, CPC-H, CCS-P
- 20 Don't Let Vaccines Poke Holes in Your Practice's Pockets**
Lisa Jensen, MHL, FACMPE, CPC
- 26 Lives Enhanced by Coding**
Michelle A. Dick
- 30 Skin Neoplasm Codes**
Trina Cuppett, CPC, CPC-H
- 32 Coder vs. Machine—10 Rounds in the Ring**
Stephen C. Spain, MD, FAAP, CPC, and Kathy Rowland, CPC, CEMC, MCS-P
- 34 Five Common OB/GYN Scenarios Reveal Coding Answers**
Peggy Stilley, CPC, CPC-I, COBGC, ACS-OB
- 48 2010 PQRI Moves Forward**
Julie Orton Van, CPC, CPC-P, CEMC, CGSC, COBGC
- 52 CMS Rehabilitates CR, ICR, and PR Guidelines**
G. John Verhovshek, MA, CPC
- 54 CMS Clarifies Meaningful Use and Eligible Providers**
Janice G. Jacobs, CPA, CPC, CCS, ROCC

On the Cover: When Jacqueline J. Stack, AAB, CPC, CPC-I, CEMC, CFPC, CIMC, CPEDC, CCP-P, of Oil City, Pa. reflects on her coding journey, she sees her credentials as the key to achieving new heights. Cover photo by Dave Cyphert (www.propointmedia.com).

In Every Issue

- 5 Letter from the Director**
- 7 Letter from Member Leadership**
- 8 Coding News**
- 10 Letters to the Editor**

Education

- 24 2010 National Conference—AAPCCA**
Wendy Grant, CPC, and
Diana Yates, CPC, CPC-H, CPC-I, CPEDS
- 25 Ride the Bus to Nashville**
- 44 Road Map to ICD-10-CM**
Deborah Grider, CPC, CPC-H, CPC-I, CPC-P, CPMA,
CEMC, COBGC, CPC-D, CCS-P
- Online Test Yourself – Earn 1 CEU**
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publications/coding-edge/archive.aspx](http://www.aapc.com/resources/publications/coding-edge/archive.aspx)

People

- 38 Newly Credentialed Members**
- 51 Meet the AAPC Staff**

Coming Up

Mentoring

Modifiers 50, LT, RT

2009 Coder/Networker

Coding from Notes

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The membership of AAPC, and subsequently the readership of *Coding Edge*, is quite varied. To ensure we are providing education to each segment of our audience, in every issue we will publish at least one article on each of three levels: apprentice, professional and expert. The articles will be identified with a small bar denoting knowledge level:

APPRENTICE	■	Beginning coding with common technologies, basic anatomy and physiology, and using standard code guidelines and regulations.
PROFESSIONAL	■■	More sophisticated issues including code sequencing, modifier use, and new technologies.
EXPERT	■■■	Advanced anatomy and physiology, procedures and disorders for which codes or official rules do not exist, appeals, and payer specific variables.

advertising index

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www.amabookstore.com

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www.ashim.org

Billing-Coding, Inc p. 22
www.billing-coding.com

Catamount Associates p. 17
<http://catamountassociates.com/>

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CodingCert.com p. 9
www.CodingCert.com
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www.CodingConferences.com

CodingWebU p. 55
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A Life Enhanced Through Coding

Our cover feature in this month's *Coding Edge* talks about individuals whose lives have been changed by a career in medical coding. In that spirit, I'd like to relate my own "coding journey."

A year out of school, I still wasn't sure what I wanted to be when I grew up. I had always enjoyed writing, however, so when I saw a "help wanted" ad in my local paper seeking an editorial assistant for a newsletter publishing company, I jumped at the chance. After six weeks and three interviews, I landed an entry-level job with the publishers of *Coding Alert* newsletters.

During this time, I had to absorb a lot, rapidly. Not only did I have to learn about publishing and hone my editing skills, I had to master the daunting concepts and language of medical coding. With the help and encouragement of my supervisors, co-workers, and especially those coding experts who were willing to share their own expertise with me, I was able to advance quickly. I began writing for the *Coding Alert* newsletters and tapping into my love of teaching by occasionally speaking on coding topics. As a coding educator, I had the responsibility to master my subject. I think I did that when, in January 2003, I became a certified professional coder (CPC®).

A year and a half ago, I joined the AAPC as Director of Clinical Coding Content. I review and edit the articles in *Coding Edge* and other AAPC publications for coding accuracy, and write and teach on coding topics. It's not always easy to explain "what I do" at a party, but I'm grateful to have found a profession that keeps me engaged and that challenges me to keep learning and improving my skills.

My story may not seem typical, but it points out that a successful career in coding may



You have to reach for the opportunities available to you, even if it means going outside your comfort zone.

follow a variety of paths. Many AAPC members aren't strictly coding claims in the office or facility. They may be coding educators, compliance experts, or auditors. Evolving conditions bring new opportunity.

Consider the potential rise of electronic medical records (EMRs). Like any tool, the EMR must be designed, applied, and maintained properly. It will need to be customized and updated to meet the needs of the particular setting in which it is applied. EMR use will have to be monitored to ensure that compliance and coding rules are followed. Who better than coders—working hand-in-hand with providers—possess the knowledge to meet these challenges? Whatever your feelings on government-sponsored health care; rising medical costs inevitably will bring ever-closer scrutiny from government and private payers. The coder's role becomes more central in such an environment.

I believe my story is typical in demonstrating that several factors contribute to a

successful coding career. First, you have to reach for the opportunities available to you, even if it means going outside your comfort zone. As Will Rogers said, "Even if you're on the right track, you'll get run over if you just sit there." Next, it's important to stay current and keep yourself educated. Lastly, be involved. Coders are their own best resource, so be sure to share your questions and your knowledge. You'd be surprised what you can learn by teaching. Go to your local AAPC chapter meetings. Join the AAPC message boards. Consider submitting an article to *Coding Edge*. Become a mentor: I never would have succeeded without the help of my mentors—many of whom I call on still.

Involve yourself, and you'll not only improve your skills as a coder, but like me, you'll likely gain some great friends in the process. ■

Sincerely,

G. John Verhovshek, MA, CPC



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Keep Billing In-house or Contract it: You Decide

As the president and CEO of a billing company, I have seen firsthand the pros and cons for using a billing company. Whether you are contemplating changing billing companies or establishing in-house billing, you should know neither is a perfect situation. If you like to be in control and feel you can hold down costs, maybe in-house billing is right for you. If you're a large group, however, utilizing a billing company can reduce your overhead and a tremendous amount of responsibility.

Today's Technology Requires Greater Investment

While traveling for billing and coding consulting, I find many physicians who still believe anyone can put a bill out. That may have been true 10-15 years ago, but not today. The health care industry continues to go through massive changes such as Health Insurance Portability and Accountability Act (HIPAA), ICD-10, recovery audit contractor (RAC) audits, the 5010 transaction standard, government controlled health care, clearing houses, electronic funds transfers (EFT), and billing system costs that can easily reach six digits.

To help you decide on whether in-house billing or hiring a billing company is right for your practice, consider this:

When a billing company guarantees to increase revenue, run the other way.

The only thing they should guarantee is compliance. If your documentation and claims are compliant, then you'll collect maximum revenue. To guarantee increased revenue is a red flag for fraud.

All coding should be performed or supervised by a certified coder. Coding rules change annually. The responsibility of utilizing correct tools of the trade, reporting documentation deficiencies, and asking the physician documentation questions falls on the coder. Coders are an integral part of the team, the same as billers, nurses, technologists, and even physicians. They understand the coding rules and help a practice with compliance if audited.

Check the days in accounts receivable (A/R). Someone in the group should look over the monthly reports. Many managing partners do not understand their reports, which makes running them a waste of time. You should carefully review the age of monthly claims. The majority of claims should be in either the 30 or 60 day aging buckets. These two buckets generally are considered "current charges," based on the premise that all clean claims will be paid within 60 days or less. If you find large amounts of claims sitting in the 90, 120, 150, or 180 buckets, there is a problem with your system, billing, coding, staff, documentation, and/or payer. You should have 10 percent or less in these buckets, especially the 120 day or older buckets. If you have a lot of old claims that aren't paid, contact the carrier and ask why.

If you are billing in-house, is your system sophisticated enough for billing staff to complete follow-up tasks, correct insurance correspondence, post payment, and call carriers? Are the majority of your claims posted electronically? Do you send out claims daily? Do you have adequate staff and do you invest in their continued training? With major changes coming at us over the next 3-4 years, it will not be business as usual.

What is your plan for converting to ICD-10? Your system should accommodate billing the old accounts receivables with ICD-9 simultaneously with new claims using ICD-10. Physicians should be trained in the documentation requirements. Your billing company should assist the physicians with some of that training.

Billing and coding staff should have regular meetings to perform claim audits. Billers should alert coders of any denials based on coding errors. Fixing claim denials based on coding errors is a coder's responsibility, not the billing staff. Whenever I mention this to coders, I am told they have never met the billing staff. How can a coder know what a carrier requires, and a biller fix the coding errors confidently, without communication?



Only you can decide what is best for your group or office. Consider hardware, software, staff education, staff training, and upcoming changes before making a choice; the wrong decision may be more costly than you can afford. ■

Sincerely,

**Terrance C. Leone,
CPC, CPC-P, CPC-I, CIRCC
President, National Advisory Board**



coding news

Implementation Date Set for April OPPS Changes

The Centers for Medicare & Medicaid Services' (CMS) April 2010 update of the hospital Outpatient Prospective Payment System (OPPS) implementation date is April 5. The Recurring Update Notification, Change Request (CR) 6857, describes changes to and billing instructions for payment policies implemented in the April 2010 OPPS update. This CR affects chapter 4, sections 200.9 and 240.1 and chapter 32, section 140.4.1 of the *Medicare Claims Processing Manual*. Updates include:

- April 2010 Integrated Outpatient Code Editor (I/OCE); and
- OPPS Pricer reflecting the HCPCS Level II, Ambulatory Payment Classification (APC), HCPCS modifier, and revenue code additions, changes, and deletions.

The most notable change is in chapter 32, "Billing Requirements for Special Services, 140.4.1—Coding Requirements for Pulmonary Rehabilitation Services Furnished On or After January 1, 2010," which states:

If medically necessary, separately reportable respiratory or pulmonary services are furnished to a patient in a hospital or practitioner's office and those services do not meet the diagnosis and coverage criteria for pulmonary rehabilitation services, then those services should not be reported using HCPCS code G0424 but should be reported using the appropriate CPT® or HCPCS codes.

Other significant changes are to 240.1—Editing of Hospital Part B Inpatient Services, which previously applied only to fiscal intermediaries (FI), but now includes specific instructions for Part A and Part B Medicare Administrative Contractors (A/B MACs), as well.

Codes 038X and 039X have been added to the list of Revenue codes for the contractor to use to prevent payment on Type of Bill (TOB) 12x claims.

For the complete CMS CR, go to www.cms.hhs.gov/transmittals/downloads/R1924CP.pdf.

VMS Tests for HIPAA 5010


The ViPs Medicare System (VMS) shared system maintainer will test end-to-end Health Insurance Portability and Accountability Act (HIPAA) 5010 changes and interfaces to assure all changes are made correctly. Implementation date is July 6.

This policy is part of the Health Insurance Reform modifications to HIPAA final rules published in the *Federal Register* on Jan. 16, 2009 by the U.S. Department of Health and Human Services (HHS), 45 CFR Part 162.

According to CMS, the VMS shared system maintainer should:

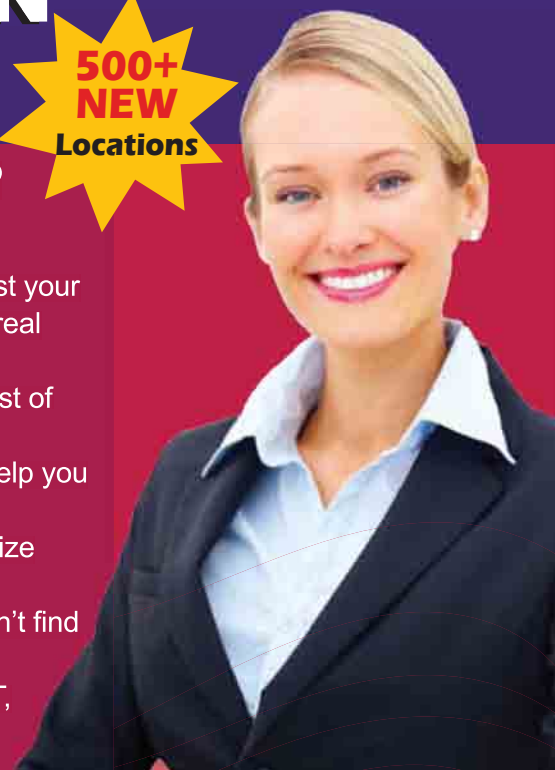
- *Execute HIPAA 5010 and D.0 End-to-End testing on the VMS system to verify implementation. Where feasible this testing will also include exchanging test files with CERT and COBC, as well as CEDI to verify external interfaces. This testing should include simulation testing of the cut-over, using 4010A1 and NCPDP 5.1 transactions and then moving to only 5010 and NCPDP D.0 transactions, to ensure a smooth transition.*
- *Rectify errors found during the HIPAA 5010 testing. If not feasible for any reason, maintainer will log errors, and schedule them to be fixed under a subsequent Change Request.*

In accordance with HIPAA standards, Version 5010 will allow for reporting the extra digits required for ICD-10-CM code system implementation, which is scheduled for Oct. 13, 2013.

For more on Version 5010, see "Version 5010: More Than a Software Update" on page 44 of this issue of *Coding Edge* and CMS transmittal 6460, available for download at: www.cms.hhs.gov/transmittals/downloads/R646OTN.pdf. 

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Letters to the Editor

Subsequent Care Codes Are Appropriate for Inpatient Consultative Services, CMS Says

In response to Karen Pettit's article discussing Medicare requirements to report consultation services ("CMS Provides Reporting Consultative Services Details," March 2010 *Coding Edge*, pages 34-37): *MLN Matters* SE1010 does give specific instruction on appropriate coding to Medicare payers for inpatient consultative services that do not meet the documentation requirements to satisfy level of service 99221 *Initial hospital care, per day, for the evaluation and management of a patient which requires these three key components: A detailed or comprehensive history; A detailed or comprehensive examination; and Medical decision making that is straightforward or of low complexity.*

The Question and Answer portion of *MLN* SE1010 offers the following information:

Q. How should providers bill for services that could be described by CPT® inpatient consultation codes 99251 or 99252, the lowest two of five levels of the inpatient consultation CPT® codes, when the minimum key component work and/or medical necessity requirements for the initial hospital care codes 99221 through 99223 are not met?

A. There is not an exact match of the code descriptors of the low level inpatient consultation CPT® codes to those of the initial hospital care CPT® codes. For example, one element of inpatient consultation codes 99251 and 99252, respectively, requires "a problem focused history" and "an expanded problem focused history." In contrast, initial hospital care code 99221 requires "a detailed or comprehensive history."

Providers should consider the following two points in reporting these services. First, CMS reminds providers that code 99221 may be reported for an E/M service if the requirements for billing that code, which are greater than consultation codes 99251 and 99252, are met by the service furnished to the patient. Second, CMS notes that subsequent hospital care codes 99231 and 99232, respectively, require "a problem focused interval history" and "an expanded problem focused interval history" and could potentially meet the component work and medical necessity requirements to be reported for an E/M service that could be described by consultation code 99251 or 99252.

Q. How will Medicare contractors handle claims for subsequent hospital care CPT® codes that report the provider's first E/M service furnished to a patient during the hospital stay?

A. While CMS expects the CPT® code reported accurately reflects the service provided, CMS has instructed Medicare contractors to not find fault with providers who report a subsequent hospital care code in cases where the medical record appropriately demonstrates that work and medical necessity requirements are met for reporting a subsequent hospital care code (under the level selected), even though the reported code is for the provider's first E/M service to the inpatient during the hospital stay.

From these statements, it's clear that, as a matter of national policy, the Centers for Medicare & Medicaid Services (CMS) supports the use of subsequent hospital care codes 99231-99232 *Subsequent hospital care, per day, for the evaluation and management of a patient* to report inpatient consultative services that do not rise to the level of an initial inpatient service, 99221.

For instance, an endocrinologist is called to consult one of his patients who is admitted to the hospital for a hip fracture. The orthopedist billed the admit 99222-AI *Initial hospital care, per day, for the evaluation and management of a patient, which requires these three key components: A comprehensive history; A comprehensive examination; and Medical decision making of moderate complexity.-Dressing for one wound.* Because the endocrinologist knows this patient—and because this patient was recently seen by him or her (three weeks ago)—the documented history is only an expanded problem-focused history. Because initial hospital visits need three out of three elements, the visit that included this expanded problem-focused history, expanded problem-focused exam, and moderate medical decision making does not meet the documentation guidelines for a 99221-99223. It does meet the medical necessity and documentation guidelines for a 99232 *Subsequent hospital care, per day, for the evaluation and management of a patient, which requires at least two of these three key components: An expanded problem focused interval history; An expanded problem focused examination; Medical decision making of moderate complexity,* so for Medicare, it should be coded as a level two follow-up visit in place of a consultation.

Barbara J. Cobuzzi, MBA, CPC, CENTC, CPC-H, CPC-P, CPC-I, CHCC
President, CRN Healthcare Solutions

Thanks for the update! Readers can find *MLN Matters* article SE1010 on the CMS website, at www.cms.hhs.gov/MLNMattersArticles/downloads/SE1010.pdf. ■

A person with long dark hair, wearing a light-colored tank top and dark pants, stands in a field of tall grass with their arms raised in a 'V' shape. The sun is low on the horizon, creating a bright glow and lens flare effect. The sky is a mix of blue and white clouds.

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Identify and Target

Correct Neuro Radiosurgery Codes

Blast away coding misconceptions for proper neurosurgeon payment.

By Janice G. Jacobs, CPA, CPC, CCS, ROCC

Stereotactic radiosurgery is a noninvasive method of delivering external radiation to eradicate or immobilize tumors or other abnormalities using highly-focused gamma rays or X-ray beams that converge on the area of interest with minimal damage to the surrounding tissues.

Stereotactic radiosurgery is performed on various types of equipment that use different instruments and sources of radiation. These include the Gamma Knife®, linear accelerator (LINAC, which includes CyberKnife®), or proton beam (heavy-charged particle) radiosurgery. The Gamma Knife is best suited for small or medium lesions, whereas a linear accelerator is preferable for larger tumors treated in a single session, or with multiple sessions or fractionation. Proton beam therapy is not used widely in the United States; however, the number of radiation therapy centers offering this service has increased in recent years.

The coordination of care for a patient diagnosed with a lesion of the nervous system requires a team of professionals including: the neurosurgeon and the radiation oncologist, as well as the physicist, dosimetrist, and radiation therapist/technician. The radiation oncologist and neurosurgeon oversee the treatment and monitor results.

Clarify Spotty Coding

Coding and billing for these services can be complex and confusing due to the nature and extent of the treatments. For example, the radiation treatment management may be billed by both physicians overseeing a course of treatment; however, each physician has his or her own distinct set of codes in two separate sections of the CPT® manual Surgery/Nervous System (Neurosurgeon) and Radiology/Radiation Oncology (Radiation Oncologist).

The cranial stereotactic radiosurgery codes (61795-61800) are listed in the Surgery/Nervous System section of the CPT® manual, and cover services performed by the neurosurgeon. The radiation oncology codes (77261-77790) are listed in the Radiation Oncology section of the CPT® manual, and cover services such as treatment planning, physics, dosimetry, devices, treatment delivery, treatment management, and other special services.

Until the introduction of CPT® 2009, neurosurgeons had only a single code, 61793, available to cover all stereotactic radiosurgery services. Beginning in January 2009, 61793 was deleted because it no longer described adequately services the neurosurgeon performed. In its place, seven new codes were added to identify and capture better these services:

- 61796** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); 1 simple cranial lesion
- +61797** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); each additional cranial lesion, simple (list separately in addition to code for primary procedure)
- 61798** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); 1 complex cranial lesion
- +61799** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); each additional cranial lesion, complex (list separately in addition to code for primary procedure)
- +61800** Application of stereotactic headframe for stereotactic radiosurgery (list separately in addition to code for primary procedure)
- 63620** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); 1 spinal lesion
- +63621** Stereotactic radiosurgery (particle beam, gamma ray, or linear accelerator); each additional spinal lesion (list separately in addition to code for primary procedure)

Note: The codes are divided into two broad categories: those pertaining to cranial lesions and those pertaining to spinal lesions.

Cranial Lesions: Simple and Complex

Use CPT® 61796 and add-on 61797 for simple cranial lesions of less than 3.5 cm at their maximum dimension that do not otherwise meet the criteria for complex lesions (as outlined below).

Use code 61798 and add-on code 61799 for complex cranial lesions. All lesions that are 3.5 cm or greater at their maximum dimension are considered complex. "Any lesion



Beginning in January 2009, 61793 was deleted because it no longer described adequately services the neurosurgeon performed. In its place, seven new codes were added to identify and capture better these services.

[regardless of size] that is adjacent (within 5mm) of the optic nerve, optic chiasm, optic tract, or within the brain-stem is complex," according to CPT® instruction.

For example, a patient presents with two astrocytomas of the frontal lobe, one 2 cm and the other 1.5 cm. Correct coding in this case is 61796, 61797.

In a second example, a patient presenting with a 4.0 cm glioblastoma of the temporal lobe is coded as 61798.

When coding for treatment of multiple lesions, if one of the lesions is complex, report 61798 with 61799 for each additional lesion. Do not use 61796 at the same time as 61798.

For example, a patient presents with two gliomas within the brain stem, one 2.5 cm and the other 1.0 cm. Correct coding is 61798, 61799.

When performing a procedure that creates a therapeutic lesion, such as a thalamotomy or pallidotomy, report a single unit of CPT® code 61798 regardless of the number of therapeutic lesions created.

For example, a patient presents with Parkinson's Disease and the neurosurgeon performs a therapeutic pallidotomy. During the procedure a small part of the globus pallidus is destroyed. This creates a scar that relieves symptoms, such as tremors and rigidity, and improves balance. Correct coding is 61798.

Note: Because computer-assisted planning is included in 61796-61799; add-on code 61795 *Stereotactic computer-assisted volumetric (navigational) procedure, intracranial, extracranial, or spinal* is not used with those codes.

As illustrated in the above examples, primary stereotactic radiosurgery codes 61796 and 61798 are reported only once per course of treatment. Also, add-on codes 61797 (simple) and 61799 (complex) are not reported more than four times in any combination for the entire course of treatment, regardless of how many lesions are being treated.

CPT® code 61800 is used for the application of a stereotactic headframe for immobilization during stereotactic radiosurgery, and does not include the removal (which typically is performed by the radiation oncologist after treatment delivery). The removal (if performed by a physician other than the one who placed the headframe)

is coded separately using 20665 *Removal of tongs or halo applied by another physician*.

Spinal Lesions: Once per Course

Do not report CPT® code 63620 used for spinal lesions more than once per course of therapy. Code 63621 cannot be reported more than once per lesion, and no more than two times over the entire course of therapy regardless of the number of lesions treated, according to CPT® instruction.

For example, a patient presenting with three multiple myelomas of the spine: one 1.5 cm, one 2.0 cm, and the third 3.0 cm. The patient received fractionated stereotactic radiosurgery three times per week for two weeks. Correct coding is 63620-63621 x 2.

Note: The spinal codes do not distinguish between "simple" and "complex" lesions, as do the cranial codes discussed above.

Radiosurgery Bundles Variety of Services

Unlike the radiation oncology codes, which break many services out separately, the radiosurgery codes include services such as treatment planning, dosimetry, targeting, blocking, and positioning. The neurosurgeon who reports the stereotactic radiosurgery codes, should not report codes from the radiation treatment management code series (77427-77435).

When coding services for both the neurosurgeon and the radiation oncologist, remember each specialty has its own set of codes to capture radiation treatment management. Medical record documentation must indicate clearly who performed the services, and care must be taken to ensure the same services are not billed by both departments under the same codes. ■



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Pinpoint Common Chiropractic Coding Modality Errors

Determining modality or procedure and supervision or constant attendance can narrow code selection.

By Michael D. Miscoe, JD, CPC, CASC, CUC, CHCC, CRA

Those unfamiliar with chiropractic coding often assume there's not much to it. The chiropractic scope of practice varies from state to state, and in many states is quite broad. The chiropractic coder must be knowledgeable about evaluation and management (E/M), electro-diagnostic, radiology, musculoskeletal diagnostic, physical medicine, and manipulative service coding.

With respect to physical medicine services, there are a number of common mistakes. Vague code descriptions may cause confusion. When controlling carrier rules are absent, look to American Medical Association (AMA) clarifications for guidance. Most errors arise from failure to evaluate the nature of the service provided—specifically, whether the service is classified as a modality or procedure. Where modalities are concerned, providers often fail to consider whether the modality requires supervision or constant attendance.

Define Your Terms

First, consider the difference between modalities and procedures, as defined in the Physical Medicine and Rehabilitation section of the CPT® manual. Modalities are “any physical agent applied to produce therapeutic changes to biologic tissue; includes but not limited to thermal, acoustic, light, mechanical, or electrical energy.” Modalities may be classified either as supervised or constant attendance.

A supervised modality “does not require direct (one-on-one) patient contact by the provider,” and describes codes 97010-97028. A constant attendance modality “requires direct (one-on-one) patient contact by the provider,” and describes codes 97032-97039.

Play it safe: The definitional requirement for one-on-one contact is somewhat misleading because both the AMA and the Centers for Medicare & Medicaid Services (CMS) indicate in a separate clarification that constant attendance can be provided to more than one patient at a time. Taking a literal definition of constant attendance is best; however.

Although we will not address procedures in this article, it's important to know how they differ from modalities. CPT® defines a procedure as “a manner of effecting change through the application of clinical skills and or services that attempt to improve function.” This definition specifically describes codes 97110-97546 and 97780-97799. Under CPT® guidelines, all procedures (except 97150 *Therapeutic procedure(s), group (2 or more individuals)*) require direct one-on-one contact by the provider or therapist.

The key to understanding the modality/procedure distinction is two-part. The first part involves what I call “gizmo” analysis. In short, when the physical agent is provided by some device (gizmo), and the clinical skill is limited to determining the device settings and/or the application location and duration, the service is a modality. When the therapy's effect is more dependent on the practitioner's clinical skill (even where a device is used during delivery of therapy), the service is classified correctly as a procedure.

The second distinction is that modality code selection is based on the physical agent used and the performance method. In contrast, procedures are reported based on the therapeutic outcome achieved, rendering the contact necessary for performance largely irrelevant when selecting the appropriate procedure code.

With these definitions and distinctions in mind, let's analyze some common modality coding errors.

Laser Therapy

Laser therapy is a modality (a gizmo delivering the physical agent causing biologic change) and, in most cases, requires constant attendance (someone has to hold the laser probe). Often it is coded incorrectly as infrared therapy. Although the light spectrum is similar, there are two potential problems when using 97026 *Application of a modality to 1 or more areas; infrared* for laser therapy.

1.) Infrared is a supervised modality, whereas laser therapy in most cases requires constant attendance.

2.) Infrared is a thermal/heating modality, whereas laser is not (unless a Class IV laser is used). The thermal aspect of infrared is not part of the code description; however, *CPT® Assistant*—although not likely controlling—clarifies that infrared is a “Modality which uses light and heat to rinse [sic] the tissue temperature 5 to 10 degrees centigrade in the area of application” (Summer 1995, page 5).

You should report cold laser therapy using 97039 *Unlisted modality (specify type and time if constant attendance)*. As per the code descriptor, document the time of performance. The service can be reported in multiple units where sufficient time is documented.

Many carriers challenge services reported using an unlisted code such as 97039, and may deny payment on the basis that laser therapy is experimental/investigational. Such a determination permits you to bill the patient directly, and lowers the risk that the carrier will demand a future refund on the basis that the service was misrepresented using 97026.

If the carrier has adopted HCPCS Level II private payer S codes into its code set, you would instead report cold laser therapy requiring constant attendance using S8948 *Application of a modality (requiring constant provider attendance) to one or more areas; low-level laser; each 15 minutes*.

Mechanical/Vibratory Massage

At times, providers use mechanical devices providing vibration/percussion to alleviate paravertebral or other muscle hypertonicity or tension. Devices may be handheld or involve more elaborate tables or chairs. Because these devices are claimed to cause similar therapeutic effects as massage, they often are miscoded as 97124 *Therapeutic procedure, one or more areas, each 15 minutes; massage, including effleurage, petrissage and/or tapotement (stroking, compression, percussion)*. Applying the above modalities and procedures definitions, however, these services are classified correctly as modalities because the biological change is caused by the physical agent applied (mechanical vibration, percussion), and no particular clinical skill is necessary to achieve this result.

Note: This article considers AMA/CPT® guidelines only. Coding may vary depending on the existence of contrary controlling guidance from the carrier, a controlling reimbursement statute, or the inclusion of the S codes in HCPCS Level II by the carrier or the controlling reimbursement statute.

Code 97016 *Application of a modality to 1 or more areas; vasopneumatic devices* is also inaccurate. Although not likely controlling, *CPT® Assistant* (Summer 1995, page 5) advises, “These devices incorporate suction type force to the soft tissues being treated. Vasopneumatic devices are also used to describe pumps that decrease edema in extremity tissues. Examples include the Jobst Pump, Vibromassage, and Interferential Pump.” Although vibromassage might qualify for 97016, *CPT® Assistant* later clarified in a “Coding Consultation: Question and Answers” segment (May 2005, page 14):

Question

“What is the appropriate CPT® code to report for mechanical massage therapy?”

AMA Comment

“From a CPT® coding perspective, no current CPT® code specifically and accurately describes mechanical massage; therefore, code 97039, *Unlisted modality (specify type and time if constant attendance)*, would be the most appropriate code to report for mechanical massage therapy. It would not be appropriate to report code 97124, *Therapeutic procedure, one or more areas, each 15 minutes; massage, including effleurage, petrissage and/or tapotement (stroking, compression, percussion)*.”

Although the AMA appears to contradict itself, the result is accurate. Vibromassage is a suggested example of what might constitute a “pump that decrease[s] edema in extremity tissues.” Clearly, it was not envisioned that a vasopneumatic device would be used in the spinal region according to the 1995 publication, and possibly the inclusion of vibromassage as an example in 1995 was erroneous where the guidance published in 2005 is considered. There is little evidence that such devices provide



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The key to understanding the modality/procedure distinction is two-part. The first part involves what I call “gizmo” analysis ... The second distinction is that modality selection is based on the physical agent used and contact necessary for performance.

a vasopneumatic effect. Breaking the term into its parts and defining each, we find such a device provides some vascular effect using air. Given that air (specifically, air pressure) is the physical agent at issue with 97016, and that mechanical vibratory massage devices use a pure mechanical percussion or vibratory force as the physical agent, it is reasonable to conclude that CPT® 97016 is not the appropriate code for this service.

Even if we conclude such devices are pneumatic, CPT® 97016 is still improper when a hand-held device is used. CPT® 97016 requires supervision, not constant attendance. A hand-held vibratory percussion device requires constant attendance. Because no existing constant attendance code describes the physical agent at issue, 97039 is still correct.

Iontophoresis

CPT® 97033 *Application of a modality to one or more areas; iontophoresis, each 15 minutes* is appropriate for iontophoresis only. CPT® Assistant defines iontophoresis as “the introduction of ions of soluble salts into the body by an electric current.”

Some providers and coders incorrectly report iontophoresis on the basis of applying topical gels such as Kool Comfort® or Biofreeze® to the skin prior to electric stimulation pad application. The main problem here, despite the absence of ions from soluble salts, is that constant attendance isn’t required with this application type. The second, less obvious issue is related to the introduction of ions from soluble salts. McDonald J., Lundgren K., Thieme H., *Clinical Protocols*, page 48 (Clinical Education Associates, 1996) describes this service:

“Direct current has been used extensively to drive ions from the heavy metals into and through the skin for treatment of skin infections or for a counter-irritating effect. There are three techniques of application:

1. An active pad is placed over gauze that is saturated with a solution containing the ions,
2. The active electrode is suspended in a container containing the ion solution, then the part to be treated is immersed in the container or,
3. Special stimulators with a specially adapted electrode containing the treatment ions is positioned as

close to the involved tissue as possible. In all cases a large dispersive pad is applied to the patient and the proper polarity of the active electrode is selected based on the polarity of the ions in the solution.”

Because there is a significant risk of burning the patient’s skin, constant attendance is required. This therapy is used primarily by dermatologists to treat skin conditions, but may be appropriate to reduce inflammation. The variations between this form of therapy and traditional forms of electric stimulation are distinct:

1. Direct current is utilized and is passed from an active pad or electrode through the skin to a diffusion pad. Most forms of electrotherapy involve alternating current flow between two or more pads where each is an active pad.
2. Special pads containing the treatment ions are used, or a pad placed over gauze saturated with a solution containing the ions is used.
3. True iontophoresis requires constant attendance based on the patient’s risk of being burned; traditional forms of electric stimulation do not.

Hands-Free Ultrasound

Ultrasound is a constant attendance modality that uses sound waves to increase tissue temperature. CPT® Assistant (Summer 1995, page 5) reports, “This modality is used in the treatment of arthritis, neuromas, adhesive scars, and where increasing the tissue temperature is the desired effect.”

Continuous ultrasound (97035 *Application of a modality to one or more areas; ultrasound, each 15 minutes*) clearly provides such a thermal effect, while pulsed ultrasound generally is considered a non-thermal form. Continuous vs. pulsed forms of ultrasound raise interesting coding issues. Consider the description of pulsed ultrasound in *Clinical Protocols*, pages 89-101:

“Soundwave propagation is intermittent, retaining the mechanical effects of mild cavitation and micro massage *without any thermal effects* [emphasis added]. Pulsed ultrasound is beneficial in acute conditions, inflammatory responses, nerve entrapment and neuromas in scar tissue.”

Because of the lack of thermal effect with pulsed ultrasound, questions arise regarding the need for or provi-

sion of constant attendance. Currently, some pulsed ultrasound units are marketed as hands-free devices. The ultrasound head is on a mechanical arm placed over the patient. Even when argued that pulsed ultrasound can provide or is providing some thermal effect, if the therapy can be or is delivered in a supervised setting, 97035 is inappropriate. In these cases, constant attendance is not required. When ultrasound can be provided in a supervised setting, report 97039.

Phonophoresis

Phonophoresis is often misreported as an unlisted procedure (97039) on the basis that it is not a modality per CPT®. Phonophoresis is simply a fancy word for ultrasound where a steroidal cream is used in place of the usual conductive gels. *CPT® Assistant* (Summer 1995, page 5) advises, "If ultrasound therapy is used with a steroid cream, 99070 should be added, in addition to 97035, for use of the steroid cream."

Either way, ultrasound (97035) is reported, assuming constant attendance is required and maintained. The only

difference is the separate reporting of the steroid cream using the generic supply code 99070 *Supplies and materials (except spectacles), provided by the physician over and above those usually included with the office visit or other services rendered (list drugs, trays, supplies, or materials provided).*

Although CPT® definitions and clarifications found in the *CPT® Assistant* are not part of the Health Insurance Portability and Accountability Act (HIPAA)-mandated code set, application of these basic principles of modality analysis provide a sound foundation for code selection. Always be on the lookout for differing carrier standards, and follow written carrier guidance. ■



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Take Four Steps Toward Preventive Medicine Coding Success

By Beverly Welshans, CPC, CPC-I, CPC-H, CCS-P

Follow a few simple rules to prevent a lot of headaches when coding preventive medicine services.

The same care your providers take when administering preventive care to assure all has been covered must be taken when coding those services, as well. It never hurts to follow four simple rules that prevent denials on your preventive care claims.

Rule 1: Diagnosis Must Match Reason for Visit

Always match preventive medicine codes with an appropriate diagnosis. This means report a V code—even for Medicare patients.

Remember: The ICD-9-CM diagnosis code always should identify correctly the chief reason for the visit. A preventive medicine service is not a problem-oriented visit, so don't code it as one. Instead, use an ICD-9-CM code to support the services provided (e.g., V70.0 *Routine general medical examination at a health care facility for adults*, V72.31 *Routine gynecological examination for gynecologic exams* and V20.2 *Routine infant or child health check for well-child care*. Additional special screening codes (V73.0-V82.9) also may be used, as appropriate.

Rule 2: Follow “Three-Year Rule” for New vs. Established

CPT® includes two subsets of preventive medicine codes: 99381-99387 for new patients and 99391-99395 for established patients. The distinction between new and established follows the standard three-year rule. Specifically, if the patient has never been seen, or was not seen by you or anyone else in your group within the past three years, the patient is new. All other patients are established.

Tip: CPT® Evaluation and Management (E/M) Service Guidelines include a “Decision Tree for New vs. Established Patients” to help determine if a patient is reported as new or established.

The new and established patient codes are divided further by patient age:

- Younger than 1 year: 99381 (new) and 99391 (established)

- 1-4 years: 99382 (new) and 99392 (established)
- 5-11 years: 99383 (new) and 99393 (established)
- 12-17 years: 99384 (new) and 99394 (established)
- 18-39 years: 99385 (new) and 99395 (established)
- 40-64 years: 99386 (new) and 99396 (established)
- 65 years and older: 99387 (new) and 99397 (established)

Rule 3: Patient Age and Gender Determine Preventive Service Content

Preventive medicine services always include a comprehensive history and examination, and age-appropriate anticipatory guidance. The comprehensive examination is not held to the rigid “two bullets from each of at least nine body systems” required in a standard 1997 *Documentation Guidelines for Evaluation and Management Services* multi-system exam; rather it reflects the required assessment based on the patient's age and gender. The focus of services rendered to a one-year-old infant, for example, will differ from those provided to a 28-year-old woman.

Services for a young child assess physical growth (height, weight, head circumference) and development milestones (speech, crawling, and sleeping habits). Anticipatory guidance includes car seat use and other safety issues, introducing new foods, etc.

An adolescent preventive service may include a scoliosis screen, growth and development assessment, and immunization review. Anticipatory guidance will focus on developing good health habits and self-care, including possibly a discussion of drugs, alcohol, and tobacco; sexual activity; and other peer pressure issues. Educational activities and social interaction are discussed and encouraged.

In the adult population, the same principles apply. A comprehensive preventive visit for a female patient

includes a gynecologic examination, Pap smear, and breast exam. An adult male's exam includes an examination of the scrotum, testes, penis, and the prostate for older patients. (It is not appropriate for a provider to separate these services into a second visit for either patient.) Anticipatory guidance is focused on health maintenance issues: alcohol and tobacco use, safe sex practices, nutrition, and exercise. The patient's employment status and other family issues that may arise are discussed. As a patient grows older, cholesterol levels, blood sugar, and prostate-specific antigen (PSA) testing come into play. This is also the time to address advance directives with the patient.

Rule 4: Separate Services/Procedures Call for Separate Reporting

A preventive visit includes routine screenings such as a tuning fork hearing assessment and a visual acuity screening. Many other services that may be provided at the time of a preventive visit, however, are not included.

The immunization supply and administration laboratory and radiology services, electrocardiograms, and other services with an identifiable CPT® code can be billed in addition to the appropriate preventive service visit code. Remember to append modifier 25 *Significant, separately identifiable evaluation and management service by the same physician on the same day of the procedure or other service* in this scenario, to identify the preventive medicine E/M service as separate and distinct from other procedures or services provided to the same patient on the same day.

For example, a 45-year-old established female patient presents for her annual physical examination. While there, she complains her left ear feels "plugged." During the course of the history and physical (H&P), the provider observes significant cerumen buildup, and has the nurse flush the patient's ears. In this situation, both services may be billed with a modifier 25 appended to the annual physical (i.e., 99396-25, 69210 *Removal impacted cerumen (separate procedure), 1 or both ears*).

What if, during a preventive visit, a new problem is encountered or an existing problem requires attention? The American Medical Association (AMA)

The distinction between new and established follows the standard three-year rule. Specifically, if the patient has never been seen, or was not seen by you or anyone else in your group within the past three years, the patient is new. All other patients are established.


gives direction for these occasions in the CPT® guidelines, as follows:

"If an abnormality is encountered or a preexisting problem is addressed in the process of performing this preventive medicine evaluation and management service, and if the problem or abnormality is significant enough to require additional work to perform the key components of a problem-oriented E/M service, then the appropriate Office/Outpatient code 99201-99215 should also be reported."

Remember: In a case such as this, you would append modifier 25 to the office visit code.

"Significant" is the key word here. A preventive visit requires a comprehensive history and examination of the patient. Any work done to support the additional E/M code has to be above and beyond what is already documented to support the preventive code billed. If the criteria are met and an E/M office visit code is billed, be certain to provide an appropriate ICD-9 code to support the additional service.

For example, a 19-year-old established male presents for his annual physical. He asks the provider to look at his right ankle. He states he twisted it snowboarding last night, and it is "killing him." In addition to performing a routine H&P, the provider conducts an expanded problem-focused history relevant to the injury, and performs an expanded problem-focused knee exam. The provider diagnoses an ankle sprain, but wants to rule out a fracture. He orders an X-ray and instructs the patient to rest, apply ice, and elevate the ankle. The provider then writes a prescription for pain medication and tells the patient he will be contacted with the X-ray results.

In this situation, both the annual physical, 99395 with V70.0, and the appropriate level E/M office visit code (for example, 99213-25) with diagnosis 845.00 *Sprains and strains of ankle, unspecified site* may be billed. 



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Don't Let Vaccines Poke Holes in Your Practice's Pockets

Administer the correct codes to keep reimbursement healthy.

By Lisa Jensen, MHL, FACMPE, CPC

Each year, a team of top disease experts and practice physicians work together to decide what changes will be made to the childhood immunization schedule, which helps protect U.S. children and adults from diseases. The schedule (www.cdc.gov/vaccines/recs/schedules/child-schedule.htm#printable) is evaluated based on the most recent scientific data available. Changes are announced in January and approved by the American Academy of Pediatrics (AAP), the Centers for Disease Control and Prevention (CDC), and the American Academy of Family Physicians (AAFP). Providers receive notice of the changes, and are expected to purchase and administer the immunizations to fit the new schedule.

Over the last several years new and expensive vaccines added to the schedule for adolescents, adults, and children have created a financial hardship for providers trying to balance economic pressures and best practices. A survey commissioned by the National Vaccine Advisory Committee (NVAC) reported that 62 percent of decision makers in practices delayed purchase of a vaccine some time within the past three years due to financial concerns. The survey revealed that in the prior year 16 percent of practice decision makers seriously considered stopping vaccinations for privately-insured patients due to high cost and reimbursement issues.

Offset High Costs with Appropriate Billing

How can practices continue to protect the communities they serve, prevent disease outbreak, and maintain financial viability? One way is to report the vaccines and vaccine-related services accurately, and bill appropriately. You should report vaccine administration using two families of CPT®

codes: One for the vaccine itself and one for the vaccine's administration.

To facilitate immunization reporting, the most recent new or revised vaccine product codes, resulting from recent CPT® Editorial Panel actions, are published on the American Medical Association (AMA) CPT® website on July 1 and Jan. 1 in a given CPT® cycle. These dates correspond with CPT® Editorial Panel meetings for each CPT® cycle (June, October, and February).

Watch for a lightning bolt symbol that was added to CPT® in 2006 for vaccine codes pending approval from the Food and Drug Administration (FDA). A full list is in Appendix K. These are normally not reimbursed until the FDA approves the vaccine but have been assigned codes pending approval, which often happens during that CPT® cycle.

Correct Vaccine Reporting

Use CPT® code range 90476-90478 to report the vaccine or toxoid product only, based on the produce manufacturer and brand, the specific schedule, chemical formulation, dosage, patient's age, and/or route of administration. The exact vaccine provided must be reported this way to meet the requirements of immunization registries, vaccine distribution programs, and other reporting systems that track usage and administration of vaccines.

With the dizzying array of vaccine producers and product names, it's challenging to keep the CPT® and ICD-9-CM codes straight. The AAP provides a free table with an easy-to-follow format allowing coders to access the correct CPT® and ICD-9-CM code by knowing either the manufacturer or brand name. This resource can be found on the AAP web-

site at <http://practice.aap.org/content.aspx?aid=2334&nodeID=2002>.

Be Cautious with Combination Doses

Codes are available for either individual vaccines or combination vaccines. Combination vaccines are formulations of antigens that combine multiple vaccines into a single injection (for example, 90707 *Measles, mumps and rubella virus vaccine (MMR), live, for subcutaneous use*). It is *not* appropriate to report the components of a combination vaccine when a single CPT® code exists to report the combination.

Report Vaccine Administration Separately

CPT® code range 90465-90474 reports the administration of the vaccine. Report these codes separately from the CPT® code representing the vaccine product itself. These codes are reported based on the route of immunization, the patient's age, the number of injections, and the product administered.

Each family of codes contains a code for the "first" or "one" immunization administration.

CPT® codes 90465 *Immunization administration younger than 8 years of age (includes percutaneous, intradermal, subcutaneous, or intramuscular injections) when the physician counsels the patient/family; first injection (single or combination vaccine/toxoid), per day* and 90471 *Immunization administration (includes percutaneous, intradermal, subcutaneous, or intramuscular injections); 1 vaccine (single or combination vaccine/toxoid) are reported for the first vaccine administered by the injection route to a patient on a calendar date.*

Codes 90467 *Immunization administration younger than age 8 years (includes intranasal or oral routes of administration) when the physician counsels the patient/family; first administration (single or combination vaccine/*



toxoid), per day and 90473 *Immunization administration by intranasal or oral route; 1 vaccine (single or combination vaccine/toxoid)* are reported for the first vaccine administered by the oral or intranasal route to a patient on a calendar date.

Coding Quandary: Two Different Routes on the Same Calendar Date

Confusion arises for both payers and providers when the patient requires multiple vaccines on the same date, but administered via different methods. In this scenario, report one vaccine administration code that indicates “first,” and report the other route as an additional vaccine.

For example, a patient is receiving injectable hepatitis B vaccine and intranasal influenza vaccine. Report the vaccine administration using 90471 and +90474 *Immunization administration by intranasal or oral route; each additional vaccine (single or combination vaccine/toxoid)* (List separately in addition to code for primary procedure).

Physician Face-to-Face Vaccine Counseling

CPT® contains pediatric-specific vaccine administration codes (90465-90468) with special requirements. To report 90465-90468, the patient must be younger than eight-years-old and the physician must perform face-to-face counseling personally. These special codes include the provider work of discussing risks and benefits of the vaccines, the cost of the nursing time to record and give the vaccine, plus the supplies associated with vaccine administration. To support these codes, the medical record must include the physician’s personal involvement in the parent/family counseling about the vaccine’s risks and benefits.

If the patient is eight years or older, and/or the physician does not personally perform the face-to-face counseling, report a CPT® code from range 90471-90474.

In CPT® 2009, the AMA clarified that vaccine counseling is not included in the Preventive Medicine Visits code range 99381-99397. The CPT® book instructs coders to report immunization and vaccine risk/benefit counseling separately when performed on the same day as a preventive service.

If your practice is having trouble getting the vaccine counseling/administration codes reimbursed with other services, the Childhood Immunization Support Program (CISP) site, in cooperation with the AAP, provides information that you can share with your payers, explaining the vaccine work that is and is not included in the reimbursement for other services. Find the link at www.aap.org/immunization/pediatricians/immunizationcongress.html.

Coding Example:

A six-month-old patient presents to your practice requiring a diphtheria, tetanus toxoids and acellular pertussis vaccine (DTaP), a Haemophilus influenzae type b (Hib), pneumococcal (PCV), and annual influenza. The parent has read a disturbing article in a magazine regarding the risks of (DTaP) vaccines, and your provider must spend time face-to-face with the parent addressing DTaP concerns, and providing additional risks/benefits discussion. The nurse provides the information sheet and additional discussion specific to the Hib, PCV, and influenza vaccines.

Coding for this service would be:

90700 *Diphtheria, tetanus toxoids, and acellular pertussis vaccine (DTaP), when administered to individuals younger than 7 years, for intramuscular use.* This code is for the DTaP vaccine product.

90465 This code is for the immunization administration of the first vaccine including face-to-face counseling with the provider.

90645 *Hemophilus influenza b vaccine (Hib), HbOC conjugate (4 dose schedule), for intramuscular use.* This code is for the Hib vaccine product.

+90472 *Immunization administration (includes percutaneous, intradermal, subcutaneous, or intramuscular injections); each additional vaccine (single or combination vaccine/toxoid)* (List separately in addition to code for primary procedure). This code is for the “additional” administration of the Hib vaccine with counseling by the nurse.

90669 *Pneumococcal conjugate vaccine, 7 valent, for intramuscular use.* This code is for the PCV vaccine product.

90472 *Immunization administration (includes percutaneous, intradermal, subcutaneous, or intramuscular injections); each additional vaccine (single or combination vaccine/toxoid)* (List separately in addition to code for primary procedure). This code is for the additional administration of the PCV vaccine with counseling by the nurse.

90660 *Influenza virus vaccine, live, for intranasal use.* This code is for the intranasal influenza product.

+90474 This code is for the “additional” administration of the influenza vaccine by intranasal route.

Vaccines for Children (VFC) Program

Since its inception, the VFC Program has helped shift the nationwide vaccine delivery system away from public health and more toward private providers. VFC has accomplished this by providing free vaccines to primary care physicians, attempting to keep children in their “medical home” (their regular source of primary care), with the goal of decreasing private provider patient referrals to public health for immunizations.

Free vaccines are available to children who are under 19 years of age, and who meet any of the following criteria:

- Enrolled in the Medicaid program
- Do not have health insurance
- Have no coverage of immunization on their health plan
- Are American Indian or Alaskan Native

VFC vaccines are provided free to participating physicians, and patients/insurers can only be charged for the administration. Providers bill according to CPT® codes based on each vaccine (type of immunization) administered. Reimbursement through Medicaid varies by state. Some state Medicaid agencies reimburse a vaccine with multiple antigens at a higher rate than a single antigen vaccine. Some states limit the amount of administration fees reimbursed per visit. Check with your state Medicaid agency to determine how the VFC administration fees should be coded and reimbursed. This program is a good way to provide important immunity while preventing reimbursement problems.

Diagnostic Coding


The diagnosis code accompanying the vaccine administration and vaccine product CPT® code typically is specific to the disease for which the patient is being inoculated, from range V03-V06. Some payers only require the diagnosis V20.2 *Routine child health exam* or V20.31 *Health supervision for newborn under 8 days old* or V20.32 *Health supervision for newborn 8 to 28 days old* if the vaccines are administered as part of a complete physical on the same calendar day. There are many reasons why an immunization may not be given, but the ICD-9-CM book has in the past only provided coders with a single code. Tracking why an immunization was not given can be as important as tracking those that are given. The AAP has requested and recently received additional codes to identify the different reasons why a

patient did not receive a routine immunization. Be sure to indicate these circumstances in your practice when they apply:

- V64.00** Vaccination not carried out, unspecified reason
- V64.01** Vaccination not carried out because of acute illness
- V64.02** Vaccination not carried out because of chronic illness or condition
- V64.03** Vaccination not carried out because of immune compromised state
- V64.04** Vaccination not carried out because of allergy to vaccine or component
- V64.05** Vaccination not carried out because of caregiver refusal
- V64.06** Vaccination not carried out because of patient refusal
- V64.07** Vaccination not carried out because for religious reasons

V64.08 Vaccination not carried out because patient had disease being vaccinated against

V64.09 Vaccination not carried out because of other reason

The nation's providers are soldiers in the campaign to vaccinate America's citizens, but the soaring cost and rising number of new vaccines make it difficult for them to buy the shots that are often under-reimbursed. With correct coding and accurate billing of all services rendered, coders can be an important part of keeping their patients healthy. 

Lisa Jensen, MHL, FACMPE, CPC, is the manager of the Special Investigations Unit at Providence Health Plans in Beaverton, Ore. She holds a master's degree in Healthcare Business Leadership, has been a CPC® since 1996, and attained Fellowship status in the American College of Medical Practice Executives (FACMPE) in 2008.



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AAPC Code of Ethics

Members of the American Academy of Professional Coders (AAPC) shall be dedicated to providing the highest standard of professional coding and billing services to employers, clients, and patients. Professional and personal behavior of AAPC members must be exemplary.

- AAPC members shall maintain the highest standard of personal and professional conduct. Members shall respect the rights of patients, clients, employers, and all other colleagues.
- Members shall use only legal and ethical means in all professional dealings, and shall refuse to cooperate with, or condone by silence, the actions of those who engage in fraudulent, deceptive, or illegal acts.
- Members shall respect and adhere to the laws and regulations of the land, and uphold the mission statement of the AAPC.
- Members shall pursue excellence through continuing education in all areas applicable to their profession.
- Members shall strive to maintain and enhance the dignity, status, competence, and standards of coding for professional services.
- Members shall not exploit professional relationships with patients, employees, clients, or employers for personal gain.

This code of ethical standards for members of the AAPC strives to promote and maintain the highest standard of professional service and conduct among its members. Adherence to these standards assures public confidence in the integrity and service of professional coders who are members of the AAPC.

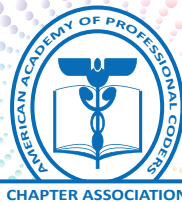
Failure to adhere to these standards, as determined by AAPC, will result in the loss of credentials and membership with the American Academy of Professional Coders.



American Academy of
Professional Coders

Wear Your Colors in Nashville

Get excited about the
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Nashville, June 6-9** through a little friendly
competition, region to region.



The **AAPCCA** Board of
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competition at the Member
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What is the “Wear Your Regional Color” competition? Each region of the country has a “color.”

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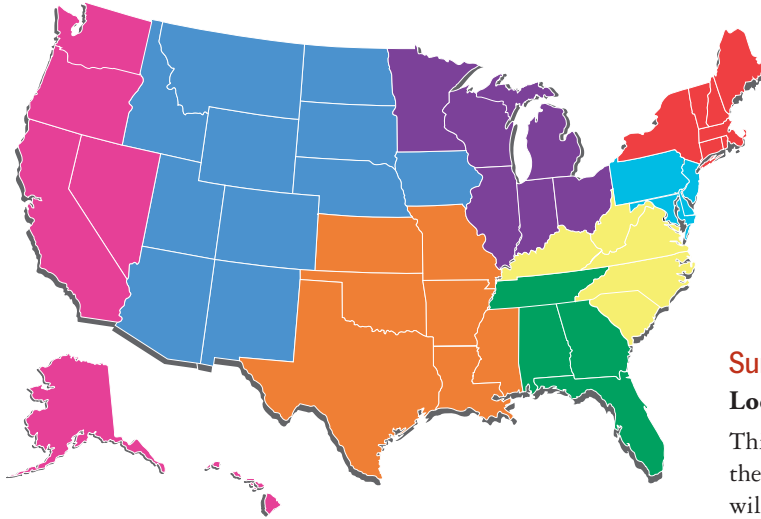
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2010 National Conference: Memories in the Making

Nashville hosts a new conference experience.

By Region 5 Representatives Wendy Grant, CPC, and
Diana Yates, CPC, CPC-H, CPC-I, CPEDS

The 2010 AAPC National Conference will be held June 6-9, in Nashville, Tenn. and the American Academy of Professional Coders Chapter Association (AAPCCA) board wants to add it to your list of unforgettable memories. Our goal in Nashville is to provide attendees and local chapter officers a conference experience unlike any other.

One of the primary functions of a conference, other than to learn and discuss coding, is to promote networking. This year, the AAPCCA board makes it easier to meet others from your area. Throughout the conference, your regional AAPCCA representatives will be wearing purple shirts with coordinating bandanas. To locate your representative, find your region's color on "Your AAPCCA Board" map.

Another welcome addition is the AAPCCA booth, set up in the main foyer of the conference center. This booth will be open daily. Here you will find a representative from your region to discuss local chapter issues, to provide guidance in using the AAPC website, and to give a welcoming smile. Come by and say "Hello!" to a regional rep.

We are honored to present new additions to this year's agenda, which is full of new and exciting sessions, networking opportunities, and individual fulfillment. The schedule of AAPCCA events is:

Sunday

Local Chapter Officer Meeting: 10 a.m.-1 p.m.

This year, the AAPCCA conference committee extends the Local Chapter Officer's meeting to three hours. There will be break-out sessions specific to officers and potential officer needs. If you've ever thought, "I wonder if I should become an officer," these are the sessions for you.

All current officers are encouraged to attend this meeting.

Hour one: You will want to participate in a question and answer session concerning officer-specific needs and duties. Attendees will be grouped by officer title.

Hour two: Everyone unites for the helpful session on "How to Handle Difficult Situations in a Chapter Setting."

Hour three: Learn how to take baby steps out of your comfort zone to become a chapter leader.

Although these sessions relate to the operation of local chapters, attendance is not limited to current officers. If you are curious about becoming a local chapter officer, these sessions are for you. Serving as an officer is both an honor and a privilege. You are necessary for local chapter success.


Meet Your Local Chapter: 4-6 p.m.

Meet officers from chapters all around the country. This is the perfect place to get new ideas, network and see what is going on in other chapters. You will also want to stop by the AAPCCA Board of Directors' table and introduce yourself to them.

Tuesday

Awards Luncheon

The awards banquet on Tuesday is being dubbed "Wear Your Region Color." All award banquet attendees are encouraged to wear their region color to this event. An acknowledgement will be awarded to the region that provides the most spirit throughout the conference. Show up, dress up, and make it a colorful event worth remembering.

Whether this is your first AAPC National Conference or your sixth, this year will be one of the most memorable and enlightening opportunities yet. Please come and experience a new and exciting conference we created just for you. Come revel with others who share a passion and joy for our profession. See you in Nashville. 

Ride the Convention Bus for CEUs, Discount, and Rest

Get first-class style on the Nashville conference coding express.

Wouldn't it be nice to go to the AAPC National Conference in Nashville, June 6-9, without costly, inconvenient travel arrangements? Flying is expensive, and you have to deal with airplane security and cramped seating. Driving is stressful and gas is expensive, too. Now imagine comfortable, worry-free travel with your coding colleagues and friends en route to conference. A pipe dream? Hardly.

Let AAPC Do the Driving This Year

Ride first class to conference in one of 19 motor coaches boasting reclining bucket seats, rest rooms, TVs, and a DVD player. Along the way, enjoy professional and personal networking—one of the best parts of being an AAPC member—and laugh, picnic, rest, and play cards or bingo with other coders from your area and chapter.

Less expensive than airfare, buses allow members faced with increasingly tight budgets to attend the Nashville conference—and you don't want to miss this one.

"AAPC members and staff will gain from some truly valuable presentations on coding, billing, compliance, electronic medical records, and ICD-10 implementation," AAPC's conference director, Melanie Mestas, told *Coding Edge*. "It will be our best conference, yet."

Cost, comfort and companionship aren't the only benefits to bus riding. "What better way to hold a chapter's June meeting than on a bus with colleagues and friends?" Marti Johnson, director of local chapters asked *Coding Edge*. Chapters holding meetings on the buses can award CEUs.

Destination: Coding Excellence

Once at conference, members can network with more than 3,000 peers from throughout the world, see what other chapters are doing, and browse the exhibit hall, Mestas said.

Sessions will be broader this year, Mestas said. Coding topics within several specialties—such as primary care, interventional radiology, orthopaedics, urology, plastic and reconstruction, neurology, and radiology—will be covered. Several presenters plan to share advanced

coding skills regarding chronic care, diagnosis, modifiers, ethics, and others. Auditing, which is even more important than ever, will be addressed by speakers giving guidance on investigations, recovery audit contractors (RACs), Medicare integrity contractors (MICs), voluntary refunds, compliance plans, and electronic medical records (EMRs). Several facility presentations also are scheduled.

Eight physicians will lead the popular Anatomy Expo, demonstrating through props, video and other means. Specialties and body parts will be covered including cardiology, cardiovascular, obstetrics and gynecology (OB/GYN), hand, podiatry, plastic and reconstructive surgery, and the knee.

Don't forget the magnificent venue. The Gaylord Opryland Hotel is built around three glass-roofed atriums, each of which holds the flowers and trees of a particular biological region of the southern states. Several restaurants, shops, and bars are nestled among the trees and flowers giving attendees a place where they can relax, talk with each other, eye souvenirs, and work.

Sign Up for the Luxury Ride Today

Signing up for the bus allows members to take advantage of the Early Bird Discount until April 15, long after the discount ends on the AAPC website. To take advantage of the \$100 Early Bird discount (making the bus trip extremely inexpensive), use the discount code "PRCF#100" when registering.

Only those who reserve a bus seat by April 15 will receive the Early Bird savings. ■

Cost, comfort and companionship aren't the only benefits to bus riding. "What better way to hold a chapter's June meeting than on a bus with colleagues and friends?" Chapters holding meetings on the buses will be able to award CEUs.

Find a bus located near you:

Atlanta, Ga.	\$105
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Chattanooga, Tenn.	\$80
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Richmond, Va.	\$135
St. Louis, Mo.	\$105

Find out more on www.aapc.com.

Lives Enhanced by Coding

By Michelle A. Dick

For many, coding is the turning point toward unlimited opportunity.

We've all had it—the moment when we're faced with that instant, unknown opportunity. It usually comes in the depths of crisis, despair, or monotony; and, we can only step into it with trust and courage. Here at AAPC we often hear about someone whose life changed because of becoming a coder and, subsequently, certified. Here are some of those life-changing stories.



Betty Bush, CPC-A

In August 2008, just three days before my 59th birthday, my employer of 20 years handed me a severance letter explaining that my position had been eliminated. I had not seen it coming, and was completely devastated.

The following weeks were a blur of every emotion imaginable—with one dominating thought, “What am I going to do now?” My work experience was in sales and marketing for home building products. Finding a job in that industry was a very slim possibility given the horrible economic state it was in. I didn’t think my teaching degree would help me either. My state was cutting positions in education—not adding them. And I was sure my age was going to make finding a job even more difficult.



I spent that fall updating my resume—a daunting task since I hadn’t looked at it in 20 years. I then spent three months searching job postings and sending out resumes with no results. It was then I decided to train myself in a new industry: health care. I needed to accomplish that in as short amount of time as possible. A nursing degree would take too long given my age—even a two-year certificate for a technician type position would not work. That’s when I found AAPC.

I started by networking through local chapters, sending emails to officers from Charlotte to Raleigh, N.C. I lucked out when one of those emails reached National Advisory Board (NAB) Member Relations officer **Julia Croly, CPC**. We emailed back and forth, and I soon ended up in her office for a face-to-face meeting to learn what medical coding was all about. Frankly, I was surprised that she made time for a total stranger. But we had a great meeting and I left excited about coding and what it could mean for my future.

From there, I just followed AAPC recommendations. I started slowly with medical terminology. I figured if I couldn’t handle the “language” there would be no need to go further. But I loved learning the words, and many times said a quiet prayer of thanks to my third grade phonics teacher for doing such a good job. Next was anatomy. This was much more of a challenge, but I now know where everything is, so to speak.

The actual coding course was next. Although somewhat overwhelming at first, I followed the AAPC course module layout one by one and was able to finish the course successfully. In preparation for the certification exam, one of our local chapters gave a review on a Saturday that helped me tremendously. I passed the exam on my first attempt that December.

My path to employment was a bit different. I started volunteering at a large hospital in my state (North Carolina) in July. Luckily, that volunteer experience networked into a full-time job in January 2010. It is not a coding position yet, but when the clinic

interviewed me in early December, I told them about the courses at AAPC and that I hoped to be certified by the end of the year. Once I was hired, my supervisor said they plan to train me as backup for the person currently doing billing/coding for the clinic.

It has truly been an amazing journey. I am proud of my accomplishment and know that with my CPC® credential, I now have something of value in an industry with boundless opportunity.



**Jacqueline J. Stack,
AAB, CPC, CPC-I, CEMC, CFPC,
CIMC, CPEDC, CCP-P**

My health care career started just before I graduated from high school. I applied at our local hospital for a position in the registration department. I was fortunate to work that job for 13 years before leaving. Following that, I worked as a receptionist in a small physician office. Later, I worked as a medical transcriptionist. Ultimately, I went back to the original physician office where I worked at the front desk and helped with billing.

In 2004, the small physician practice Seneca Medical Center, LLC (SMC) offered me a biller/coder position. One of the requirements of the job was to become a certified coder. In 2005, after studying for the CPC® exam, I took the test and passed it. At that time, I did not understand much about AAPC, but I soon found this to be the turning point in my life ... Shortly after becoming a CPC®, opportunities to better myself and my career were within my grasp.

I began attending local chapter meetings in my area. I soon learned that attending local chapter meetings offered many benefits. Attending meetings afforded me the opportunity to make friends, gain knowledge from their experiences, and share my experience and knowledge with others. I became secretary/treasurer in 2006, moved onto president-elect, and served as president in 2009.

In 2005, I began attending national AAPC conferences. These conferences are a great place to gain knowledge as well as create a network of fellow coders.

Not satisfied with status quo, I tested and passed several specialty exams; took the PMCC instructor certification; served on the committees to develop the internal medicine and pediatric specialty exams; and in 2007, I went to college.

I attend the University of Phoenix online and plan to graduate in 2011 with a bachelor of science in health administration. I also teach part time at our local university, write articles for magazines, and speak at workshops, local chapter meetings, and conferences. I serve on the AAPC NAB as well.

**AAPC provides
the opportunity
to do the
things I love:
learn, share
my knowledge,
and help others
succeed.**

I still work at SMC, which has grown into a large family practice specializing in occupational health. SMC also has their own hospitalist program and sees patients at many of the local nursing homes. The billing department now consists of five staff members. I do the billing, coding, and physician educating, and I am also the compliance officer.

Becoming a certified coder and joining the AAPC has provided me with many life-changing opportunities. My mentor, another local AAPC member, continues to inspire me. AAPC provides the opportunity to do the things I love: learn, share my knowledge, and help others succeed.

I took the paper home with me that evening and told my husband about it. He looked at it and said, “So, what are you waiting for?” The next day I called and registered.



Shelly Ghrist, CPC

Several years ago, I was managing a local Dollar Tree store and was miserable. Spending so many hours away from my family was making me very unhappy. After 10 years—though I really enjoyed what I was doing—the physical demands of the job and the long hours had taken a toll on me. One day at work, my assistant manager handed me a schedule of classes for returning adult students at the local campus—it was opened to the medical coding course. I looked at it for a few minutes, laid it aside, and went back to work. I took the paper home with me that evening and told my husband about it. He looked at it and said, “So, what are you waiting for?” The next day I called and registered.

I started the classes and was totally overwhelmed. The first class I took was medical terminology and I was sure I would never remember any of those words. I met some wonderful people at that first class, however, and together we made it through. I discovered that I was really enjoying myself. I then moved on to the anatomy class and those same people were there. We again helped each other through the complexities of anatomy. The next class was coding with **Rhonda Buckholtz, CPC, CPC-I, CENTC, CGSC, COBGC, CPEDC**. This class was six hours on a Saturday.

At this point, my district manager at Dollar Tree decided that I had to make a choice between the class and work. I made the choice to continue the class.

After I completed the coding class, Rhonda offered me a position where she was working. After three years with that employer, I did consulting work for a physician for whom I had been working off and on for about two years. What I really wanted to do, however, was start my own billing company. After a few weeks, I received a call from the physician saying that he was in need of a new billing manager. He knew I wanted to start my own business and we discussed some options. He agreed to contract me as a billing company starting Jan. 1. I made a leap of faith and started Ghrist Billing and Consulting, LLC.

I now work from home and visit the physician's office once a week to take care of any issues—and I am in negotiations with two other physicians. The dream of owning my own billing company is now a reality and I love every minute of it.

Once the opportunity pans out, what happens next?

Getting where you want to be career-wise does not happen overnight. There are many opportunities for advancement in the coding field, but to get where you want to be later on down the road, you may have to veer off course. **Deborah Grider, CPC, CPC-I, CPC-H, CPC-P, CPMA, CEMC, COBGC, CPD, CCS-P**, knows this firsthand. “I have taken salary cuts for the opportunity to advance my skills ... Sometimes you have to take a step back to take a giant leap forward—take baby steps, pay your dues,” Grider said.

“No matter where your career is right now, there are a lot of ways to take the next step,” said **Marcella Bucknam, CPC, CCS-P, CPC-H, CCS, CPC-P, CPC-I, CCC, COBGC**, keynote speaker at AAPC 2006 National Conference, St. Louis. “The key is to challenge yourself to find the things you do best—networking, education, research, compliance, contributing to articles, public speaking, chapter leadership, and participating in project groups.”

As coding professionals, “We’re lucky to have a career field where there are so many different career options that suit different personalities—capitalize on your strengths and the sky’s the limit,” said Bucknam. “Look for the opportunities presented to you. Those opportunities may be the turning point you were looking for in your life”. ■

[Michelle A. Dick is senior editor at AAPC]

Coders Who Paid Their Dues

These well-known coders' jobs weren't always quite so glamorous.

By Michelle A. Dick



Deborah Grider,
CPC, CPC-I, CPC-H, CPC-P,
CPMA, CEMC, COBGC,
CPCD, CCS-P

Worst Job

Directory assistance operator at Indiana Bell (long before the Bell System broke up). The thing I hated about that job was being chained to a telephone directory (literally) and I could not get up from my station until break time. I also hated the supervisors monitoring our calls. Fortunately, I was promoted to a business service representative after one year.

First Coding-related Job

Coder, biller, manager, and other duties as assigned at an ophthalmology group. My boss (a business savvy physician) taught me how to code and how to run a medical office. I loved that job and if the physician I worked for had not told me that it was time for me to move on, I would probably be there still.

Current Achievements

AAPC Vice President of Strategic Development as of May 2009. I am in charge of ICD-10 training, training development, and all new and potentially new areas of health care the AAPC pursues. I participate with CMS on ICD-10 outreach to providers. I testified in front of the National Committee of Health Care Vital Statistics on ICD-10 implementation.



Lynn M. Anderanin,
CPC, CPC-I, COSC

Worst Job

The only job I was ever fired from, and my worst job, a sales job selling portrait photography. I do not have the salesperson gene.

First Coding-related Job

Almost 27 years ago, I was hired as a file clerk in a physician's office. Within one year, I was coding surgeries in that office.

Current Achievements

Director of coding for Healthcare Information Services, a physician's billing office and the secretary of my local chapter. I oversee the coding of 20 coders and teach the PMCC course here. I present audio conferences for The Coding Institute (TCI) and AAPC, as well as other workshops and seminars.

Marcella Bucknam, CPC, CCS-P, CPC-H,
CCS, CPC-P, CPC-I, CCC

Worst Job

Working my way through college on a factory assembly line. I think my worst health care-related job was working for the head of a surgical residency program. The residents brought gross little bits of people in clear cups and put them on my desk for the director. I really hated that; although, it did help me get over being squeamish.

First Coding-related Job

In the '80s physicians started using ICD-9 codes on their claims for the first time ... Because I was the secretary/office manager/transcriptionist for a CT surgery practice, they gave me a CPT® and ICD-9 book and told me I was their new coder. I think that's how a lot of us ended up in coding careers in the '80s, but it was certainly a learning experience.

Current Achievements

Manager of compliance education for a large academic practice group. We have over 1,850 physician and non-physician members in every specialty and over 250 employees. I am responsible for their compliance education. It's really my dream job because I love coding, I love teaching and that's what I do all day.



Carol J. Buck,
CPC, CPC-H

Worst Job

Driving a farm-to-market potato truck. I drove alongside a harvester ... I ran into the harvester more than once and banged up both the harvester and the truck. I decided that year I would find a job that did not require me to drive anything.

First Coding-related Job

My first coding job found me. I was employed as an insurance clerk and when the coder moved to another state, the physician assigned that duty to me. I was immediately fascinated with coding and that fascination is still with me today.

Current Achievements

I am learning about ICD-10-CM and the electronic health information systems that are now part of our coding futures. These are exciting times to have a coding career.



Nancy Reading,
RN, BS, CPC, CPC-I

Worst Job

Downtown deli at age 13 for 50 cents per hour. I manned the cash register, the deli counter, grill, and scooped ice cream. One night, I sliced my finger open on the meat slicer and the boss was at home and would not let me leave to get stitches.

First Coding-related Job

I was hired at what is now Ingenix for the original R & D team to develop the Claims Edit database. I interviewed for another job and did a five minute presentation on coding in hopes I would get hired for studying up on the coding industry. I had never coded in my life. I was well trained over the next five years and absolutely loved it all.

Current Achievements

I am clinical educator for all health information at the University of Utah Hospital and Clinics. I tackle inpatient and facility coding for the outpatient clinics and love all the new challenges. I am on the implementation team for ICD-10. I am excited to put my knowledge of anatomy, physiology, and pathophysiology to good use. 📖

Skin Neoplasm Codes

FIND OUT DIAGNOSIS AND PROCEDURE CODING BASICS FOR SKIN NEOPLASMS.

By Trina Cuppett, CPC, CPC-H and G. John Verhovshek, MA, CPC

Coding skin neoplasm diagnoses and excisions requires careful attention to detail. The key to accurate reporting is knowing the sort of detail to look for and where to find it. The following basic guidelines will set you on the right path.

Diagnosis Reporting: Let Path Report Guide You

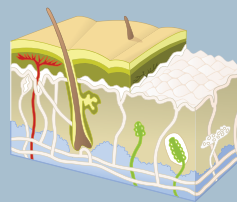
The number one rule of neoplasm coding is, “report only what documentation confirms.” Coding a neoplasm diagnosis requires a pathology report—even if the physician knows what kind of neoplasm it is without one. There is one exception to this rule: If a lesion is destroyed with lasers, chemicals, or other methods (such as cryosurgery), a pathology report will not be ordered and the physician’s documentation may be used.

The ICD-9-CM Official Coding Guidelines, chapter 2: Neoplasms (140-239), explain: “To properly code a neoplasm it is necessary to determine from the record [specifically, the pathology report] if the neoplasm is benign, in-situ, malignant, or of uncertain histologic behavior. If malignant, any secondary (metastatic) sites should also be determined.”

ICD-9-CM describes a malignant neoplasm as one of three types (each of which may be reported using a different code):

- **A primary** malignancy is the area (site) where a cancer begins to grow.
- **A secondary** malignancy is one that has spread from the primary site to other parts of the body (for instance, primary lung cancer may spread to bone, and the secondary cancer in the bone will be made up of lung cells).
- **An in-situ** malignancy is confined to its site of origin. These are early-stage tumors that may, however, evolve into invasive malignancies.

Neoplasms not identified specifically as malignant may be benign (free of cancer) or of uncertain behavior (for instance, showing indications of atypia or dysplasia). Uncertain behavior does not indicate “unknown” or “unspecified;” an uncertain (or benign) designation must be supported by histologic examination. When a pathology report is not available to confirm the diagnosis, however, the neoplasm must be coded as unspecified.



Re-Excision Calls for Original Excision Dx

If the physician excises a neoplasm, then performs a re-excision to remove additional margins at a subsequent operative session, report the same malignant diagnosis linked to the initial excision. The

coding is accurate even if the pathology report on the second excision returns benign. *ICD-9-CM Official Coding Guidelines* confirm, “If the treatment is directed at the malignancy, designate the malignancy as the principal diagnosis.”

Neoplasm Table, Tabular Index Confirms Coding

After you abstract the key information from the pathology report, turn to the Neoplasm table within the index (Volume 2 of the ICD-9-CM manual) to find the appropriate diagnosis. Codes are arranged alphabetically by site, with separate columns for each neoplasm type (primary, secondary, benign, etc.).

ICD-9-CM Official Coding Guidelines instruct, “The neoplasm table in the Alphabetic Index should be referenced first. However, if the histological term is documented, that term should be referenced first, rather than going immediately to the Neoplasm Table, in order to determine which column in the Neoplasm Table is appropriate.”

Important: For neoplasms that occur on or near the skin of an anatomic site, assign a diagnosis for skin rather than for the body area in question (for instance, “skin of hand” rather than “hand”). In every case, verify the selected diagnosis by checking the tabular list (Volume 1) of ICD-9-CM before assigning a final code. The *ICD-9-CM Official Coding Guidelines* stress, “The tabular should ... be referenced to verify that the correct code has been selected from the table and that a more specific site code does not exist.”



As an example, the physician removes a suspicious mole from the patient's earlobe. The lesion measures 2 cm. The pathology report reveals that the specimen shows an atypical lesion. To find the diagnosis, go to the neoplasm table and look for "neoplasm of connective tissue, ear (external)." Look in the Uncertain Behavior column to arrive at a provisional diagnosis of 238.1. The tabular list confirms that this diagnosis applies to "Neoplasm of uncertain behavior of other and unspecified sites and tissues; connective and other soft tissue."

Procedure Reporting: Type, Location, and Size Determine Coding

CPT® provides different code sets to report excision of benign (11400-11471) and malignant (11600-11646) skin lesions/neoplasms. The codes within each set are differentiated broadly by site (for example, trunk and arms or legs vs. scalp, neck, hands, feet, and genitalia). A quick review is all you need to familiarize yourself with the code organization. Be sure to read the CPT® guidelines in the section carefully.

Most important: Accurate lesion and margin measurements allow for complete and appropriate coding.

CPT® instructions define the excised lesion diameter as the "greatest clinical diameter of the apparent lesion plus that margin required for complete excision." This is equal to the greatest lesion size, plus twice the size of the narrowest margin (the length of the incision used to remove the lesion is not a factor). Note: Base your coding on measurements documented prior to excision (rather than taken from the pathology report, for instance).

For example, a physician removes a lesion from a patient's nose along the supra-alar crease. The lesion measures at 1.5 cm at its widest point and there is an allowance of 1.0 cm margin on all sides. The pathology report later confirms the lesion as benign. To calculate, consider the narrowest margin (1.0 cm) $\times 2 = 2$ cm. Add this figure to the widest measurement of the lesion (1.5 cm) for a 3.5 cm total. Based on the location of the lesion (nose) and the total measurement (3.5 cm), the correct code is 11444 *Excision, other benign lesion including margins, except skin tag (unless listed elsewhere), face, ears, eyelids, nose, lips, mucous membrane; excised diameter 3.1 to 4.0 cm.*

CPT® codes are based on centimeters, so if the physician reports the lesion's diameter in millimeters, you must convert the measurements (for instance, 1 mm = 0.1 cm). Please notice that some codes are reported in centimeters and others are in square centimeter measurements (0.16 sq in = 1 sq cm).

Note: There are plenty of websites (such as www.asknumbers.com) that allow you to easily perform these mathematical conversions online.

For example, if a physician documents a benign lesion excision of the upper arm that is 5 mm in diameter (including margins), this converts to 0.5 cm for CPT® coding accuracy and is reported with 11400 *Excision, benign lesion including margins, except skin tag (unless listed elsewhere), trunk, arms or legs; excised diameter 0.5 cm or less.*

Treat Each Lesion Separately

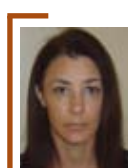
Benign and malignant lesions should be coded separately. Do not add together the excised diameters of multiple lesions as you would the lengths of multiple wounds for wound repair (12001-13160). When reporting multiple excisions, link a separate diagnosis (supported by a pathology report) to each CPT® code. Append modifier 51 *Multiple procedures* to the second and subsequent excision codes (for those payers who accept the codes) at the same location.

For example, a physician removes three lesions from a patient's left shoulder with the following measurements: 2.5 cm (malignant), 1.5 cm (malignant) and 4.1 cm (malignant).

In the CPT® index look up "Excision, Skin, Malignant," which points to the code range 11600-11646. Then, code according to the documented size of the lesions:

- 11606** Excision, malignant lesion including margins, trunk, arms, or legs; excised diameter over 4.0 cm
- 11603-51** Excision, malignant lesion including margins, trunk, arms, or legs excised diameter 2.1 to 3.0 cm
- 11602-51** Excision, malignant lesion including margins, trunk, arms, or legs excised diameter 1.1 to 2.0 cm

Understanding CPT® and ICD-9-CM coding guidelines for neoplasms is crucial to building your confidence as a coder, and to assuring that you are coding with efficiency and accuracy. ■



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Wound Repairs May Be Separate With Lesion Excision

CPT® instructions specify, "The closure of defects created by incision, excision or trauma may require intermediate or complex closure. Repair by intermediate or complex closure should be reported separately" using wound repair codes 12031-13160. Note that the Centers for Medicare & Medicaid Services (CMS) specifies slightly different guidelines per Correct Coding Initiative (CCI) edits, and bundles intermediate and complex closures with excision of 0.5 cm or less. Simple wound repairs are bundled to lesion excision for all payers under CPT® and CMS guidelines.

Look to a future *Coding Edge* for more information on reporting wound repairs.

G. John Verhovshek, MA, CPC, is AAPC's director of clinical coding communications.

Coder vs. Machine—10 Rounds in the Ring

Level of service suffers the impact of EMRs' disregard for medical decision making.

By Stephen C. Spain, MD, FAAFP, CPC, and Kathy Rowland, CPC, CEMC, MCS-P

The growing acceptance of electronic medical records (EMRs) continues to affect auditing services in new and significant ways. The number of our clients who use EMRs is on the rise, and recently we've encountered groups who increasingly rely on computerized selection of evaluation and management (E/M) level of service codes. Such audits provide an opportunity for a "head-to-head" comparison of conventional coding principles versus computerized coding systems that select level of service codes based on user input.

EMRs Promise Level of Service Code Accuracy

Like many providers and practices who have invested in EMRs, most of our clients were promised savings in processing and staffing, and improved reimbursement and charge capture. Within a year or two of adopting an EMR, some groups are secure enough to hand over the reins of code selection. This decision generally is made, in part, to allow the

organization to realize fully the upside reimbursement potential of an EMR. Reliance upon the EMR's selection process often is encouraged, if not urged, by EMR vendors.

Most EMRs can tabulate exam and history bullets to assign a level for these two key service elements. Software programs generally are incapable of calculating medical decision making (MDM) estimates, however. As part of the encounter documentation, most EMR systems require the provider select the MDM level. When the EMR has all the information, clients are told the software engine will assign the correct level of service code to the encounter.

So far, this sounds pretty good. In an ideal situation, the organization provides additional tutorials and coding advice to its providers—particularly, on the subject of calculating MDM correctly. In doing so, a provider group will be on track for a successful implementation of computerized code selection. In practice, unfortunately, problems quickly can ensue from this approach.

MDM Throws the First Punch

Some EMR coding engines can degrade accuracy of the coding process. In most cases, this occurs primarily because the engines often disregard MDM's impact on code assignment, which creates code selection problems for established patient visits. Frequently, software gives numeric values to the history and exam key elements, and then assigns a numeric value to the MDM level inputted by the provider. The engine then assesses these three values.

This system may work well for new patients, where the lowest value of any of the three components would indicate the level of service. For established patients, however, where only two of the three key elements are required, we see many errors in code assignment by software systems.

When looking at three values, a computer algorithm simply has to pick either two values that match or, if none match, the program will pick the middle value. If MDM is a matching value, or is one of the two high-end values, then the code selection is accurate. If exam and history matches, or are the two highest components; however, then the MDM value has no bearing on code selection.

As an extreme example, an established patient with a pinky sprain could generate a level five visit (99215 *Office or other outpatient visit for the evaluation and management of an established patient, which requires at least two of these three key components: A comprehensive history; A comprehensive examination; Medical decision making of high complexity*) if the provider performs a comprehensive history and exam. Because an EMR allows the



user to enter great amounts of often superfluous data, many visits are over-documented. Across the board, organizations and payers are seeing an alarming shift of level of service codes for established patients toward the comprehensive end of the spectrum. When considering use of an EMR to provide E/M level of service code selection, it is imperative to include coders in the decision-making process so they can test the EMR's system of logic and understand fully its process for assigning codes.

Put Up Your Coding Defenses

To provide a better understanding of our approach to this coding issue, let's look at our auditing practices and MDM. In a general retrospective audit, we typically apply the rules and regulations of the Centers for Medicare & Medicaid Services (CMS) and Medicare intermediaries because we find that these are the most published, most debated, and most vetted guidelines. Often, they are also the most restrictive. In our experience, if a provider is coding in compliance with the policies of CMS and its intermediaries, the encounter record and billed services generally are defensible across the board for all payers.

Coders know the CPT® manual states that only two of the three key elements are required for assessing a level of service for an established patient. Over the years, there has been debate as to whether MDM should carry additional weight for established patient visits as a marker of the overarching criteria of a service's medical necessity. MDM is clearly a limiting factor in new patient code assignment.

In conversations with multiple Medicare medical directors, it has been affirmed to us that MDM is the best key element to base an assessment of medical necessity. One Medicare director wrote "when coding based on Med Necessity, then MDM is often the lynchpin." Some Medicare intermediaries also include in their provider manuals the statement, "MDM is critical in determining the level of service." CPT® clinical examples contain scenarios that can prove to be exceptions to MDM calculating. In our experience, however, if the level of service is supported by the MDM, the provider has a solid foot should any coding challenge arise.

Expose EMR Weaknesses with Audits

We approach our audits with this understanding of MDM and, as a result, we generally find errors with the EMR-assigned E/M level of service for established patients. Coders in a recently-audited organization reported that soon after making a switch to computerized coding, concerns arose that the EMRs were generating level of service codes with a high rate of over-coding errors. Providers who are aware that their EMR-assessed level of service seem too high are concerned. As we have counseled providers on their individual audit reports, many reported to us that they are perplexed to see a software system assign 99214 *Office or other outpatient visit for the evaluation and management of an established patient, which requires*

at least two of these three key components: A detailed history; A detailed examination; Medical decision making of moderate complexity when straightforward or low MDM levels were entered.

Occasionally, our clients have their coding staff perform a parallel audit with us—both to affirm our results and to measure their own accuracy and reliability. In cases where an EMR's coding engine was used, we have performed our audit twice: once applying our conventional rules for E/M code assessment, and another time applying the client's EMR's engine logic. These audits and methodologies generally expose computerized selection process inaccuracy. We have found, typically, the EMR engines generate approximately 15-30 percent more coding errors for established patients when compared to conventional auditing tools and coding practices.

At a hefty cost to our clients, claims with incorrectly-assigned service levels are re-submitted with corrections, and some reimbursement inevitably is returned to the payers. Fortunately, some of our clients with savvy coding staff identify errors quickly and convince their administration of the value of an outside audit to address their concerns.

Arm Yourself with Knowledge

EMR companies are gaining an understanding of the complexity of the MDM issue, and are working continually to improve the code selection process. It is common for software vendors to withdraw enthusiasm for their current engine and promise an imminent upgrade that will enhance accuracy.

As a result of our audits, and usually with the blessing of internal auditors, most of our client organizations have placed the computerized level of service code selection under intense review, or have restored that decision to the authority of providers—putting the organization back in the driver's seat of the code selection process. Hopefully, the education and insight gained through careful coding oversight and auditing services will convince them to keep their hands firmly on the wheel until the promises of future versions and upgrades are proven to be true. ■



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Over the years, there has been debate as to whether MDM should carry additional weight for established patient visits as a marker of the overarching criteria of a service's medical necessity.

Five Common OB/GYN Scenarios Reveal Coding Answers

Face everyday OB/GYN coding challenges with confidence.



By Peggy Stilley, CPC, CPC-I, COBGC, ACS-OB

Are you new to obstetrics and gynecology (OB/GYN) coding? Do you wish you knew some helpful tidbits to ease daunting coding tasks? The following are scenarios most-commonly asked about by attendees during question-and-answer sessions while teaching OB/GYN. These “real world” examples can help you tackle day-to-day coding challenges in your OB/GYN practice.

Scenario No. 1: Preventive Exams—Well Woman

Medicare generally does not pay for preventive exams; however, an allowance was made for the breast, Pap, and pelvic exam (BPP). Medicare pays for a BPP exam every year for those women who:

- A.) are of childbearing age and have had an examination indicating the presence of cervical or vaginal cancer or other abnormalities during any of the preceding three years; or
- B.) are considered high risk for developing cervical or vaginal cancer.

A high-risk patient is one who has:

- ❑ Engaged in sexual activity before the age of 16;
- ❑ Had multiple sexual partners (more than five in a lifetime);
- ❑ A history of a sexually transmitted disease (including the human papillomavirus and/or HIV infection); and/or
- ❑ Had fewer than three negative Pap tests within the previous seven years.

For all other woman, defined as “low risk,” Medicare will pay for a BPP exam every two years. An overview of coverage and risk criteria may be found on the CMS website at www.cms.hhs.gov/CervicalCancerScreening/.

To qualify for Medicare coverage, a screening pelvic exam must include at least seven of the following 11 elements:

- ❑ Inspection and palpation of breasts for masses or lumps, tenderness, symmetry, or nipple discharge;
- ❑ Digital rectal examination including sphincter tone, presence of hemorrhoids, and rectal masses;

Pelvic examination (with or without specimen collection for smears and cultures) including:

- ❑ External genitalia (for example, general appearance, hair distribution, or lesions);
- ❑ Urethral meatus (for example, size, location, lesions, or prolapse);
- ❑ Urethra (for example, masses, tenderness, or scarring);

- ❑ Bladder (for example, fullness, masses, or tenderness);
- ❑ Vagina (for example, general appearance, estrogen effect, discharge, lesions, pelvic support, cystocele, or rectocele);
- ❑ Cervix (for example, general appearance, lesions, or discharge);
- ❑ Uterus (for example, size, contour, position, mobility, tenderness, consistency, descent, or support);
- ❑ Adnexa/parametria (for example, masses, tenderness, organomegaly, or nodularity); and
- ❑ Anus and perineum.

Reporting and reimbursement for BPP services requires specific HCPCS Level II and ICD-9-CM codes. A full listing of covered HCPCS Level II and ICD-9-CM codes, along with instruction for applying the codes and the minimum exam requirements listed above, is found in the *Medicare Claims Processing Manual*, chapter 18, sections 30 “Screening Pap Smears” and 40 “Screening Pelvic Exams” (www.cms.hhs.gov/manuals/downloads/clm104c18.pdf).

Providers may recommend to a patient certain exams, tests, or services that are not a covered benefit (for instance, the physician may recommend a BPP exam for a low-risk Medicare beneficiary at a frequency greater than two years since the previous exam). It is the provider and staff’s responsibility to let the patient know the service may not be covered, or the service has frequency guidelines. Coders must educate themselves: Know which services need an Advanced Beneficiary Notice (ABN), and whether modifiers are required for payment or are informational only. Bookmark the Centers for Medicare & Medicaid Services’ (CMS) website in your “favorites” menu, and be aware of local coverage determinations (LCDs) for your Medicare payer.

Scenario No. 2: Global Surgical Package

The services you’ll include, or bundle into, the global surgical package will depend on the payer for a particular claim. The global surgical package as defined in CPT® includes:

- ❑ Local infiltration, metacarpal/metatarsal/digital block or topical anesthesia
- ❑ One related evaluation and management (E/M) encounter on the date immediately prior to or on the date of the procedure (including history and physical) once the decision for surgery is made

- ❑ Immediate postoperative care; including dictating operative notes, talking with the family and other physicians
- ❑ Writing orders
- ❑ Evaluating the patient in the post-anesthesia recovery area
- ❑ Typical postoperative follow-up care

Global days associated with procedures are zero, 10 days, or 90 days. Obstetrical care is defined as global for six weeks past the delivery date.

CMS does not follow CPT® guidelines, however. The Medicare surgical package includes:

- ❑ Pre-op visits
 - Day before surgery for 90 day global
 - Day of surgery for 0-10
- ❑ Complication following the surgery—unless return to OR
- ❑ Post-op visits (related to recovery from procedure)
- ❑ Post-surgical pain management provided by surgeon
- ❑ Supplies
- ❑ Miscellaneous services (dressing changes, staple, drain, tube removal, etc; local incision care, etc.)

So, for instance, whereas a payer who follows CPT® guidelines may allow separate payment for an office E/M service to treat a surgery complication during the global period, Medicare will not allow separate payment unless the patient must return to the operating room.

Be aware of surgical guidelines when contracting with private payers. Inquire whether they follow CPT® or Medicare guidelines.

Scenario No. 3: Endometrial Ablations

Many companies produce a variety of equipment to accomplish ablations. Some instruments incorporate heat, while others use cold. When performing a thermal (heat) ablation, options include loops, roller balls, etc. Thermal ablation may be reported using either 58563 *Hysteroscopy, surgical; with endometrial ablation (eg, endometrial resection, electrosurgical ablation, thermoablation)* or 58353 *Endometrial thermal ablation without hysteroscopic guidance* at any time during the ablation, depending on whether the hysteroscope is used. Cryoablation (use of cold) is reported with 58356 *Hysteroscopic endometrial cryoablation, including endometrial curettage, when performed*.

When reporting endometrial ablations, consider also:

- ❑ Any use of hysteroscope can be billed as a hysteroscopic procedure.
- ❑ Place of service is critical to reimbursement. For instance, billing 58356 in your office renders 45.55 relative value units (RVUs), while the same procedure performed in a facility is valued at 9.71 RVUs. The higher non-facility reimbursement covers the equipment and administrative costs of running your office.

- ❑ National Correct Coding Initiative (CCI) edits apply to Medicare. CCI does not allow the provider to bill separately for anesthesia. Private payers may allow this, however; if so, bill for the para-cervical block (64435 *Injection, anesthetic agent; paracervical (uterine) nerve*).

Scenario No. 4: Urodynamics

With an aging population (and increased public awareness), urinary incontinence is no longer a forbidden topic. Patients are encouraged to discuss their problem, and physicians are educated about testing and surgical options available. CPT® 2010 offered several revisions to urodynamic testing codes, as well as new and “resequenced” codes.

51726 Complex cystometrogram, calibrated electronic equipment

51727 with urethral pressure studies, any technique

51728 with bladder voiding pressure studies, any technique

51729 with bladder voiding pressure studies, urethral pressure studies, any technique

+51797 Voiding pressure studies, intra-abdominal (ie, rectal, gastric, intraperitoneal) (List separately in addition to code for primary procedure). [This code is resequenced as well as revised.]

Urodynamic testing generally is performed by specially-designed equipment (calibrated electronic equipment), which contains graphs and/or images. From those graphs or images, a provider interprets the patient's condition and makes recommendations about treatment, therapy, or surgery that is translated into a written report.

Cystometrogram measures how well the bladder stores and empties urine; for instance, for patients with symptoms of urinary incompetence. The procedure must be performed by, or under the direct supervision of, a physician, with all supplies provided by the physician. If the physician only interprets the results and/or operates the equipment, append modifier 26 *Professional component* to identify the physician's services.

Voiding pressure studies may measure pressure either just in the bladder or in the bladder and abdomen simultaneously (as described by 51797). Subtracting the voiding abdominal pressure from the total bladder pressure on voiding gives the most accurate determination of true voiding pressure, also known as detrusor pressure. As an add-on procedure, 51797 may be reported with 51728 or 51729, which include bladder voiding pressure only. The procedure must be performed by—or under the direct supervision of—a physician, with all supplies provided by the physician.

Scenario No. 5: Adhesiolysis

Lysis of adhesions may be billed separately—either by reporting a separate CPT® code (see below) or by adding modifier 22 *Increased procedural services* to the primary procedure code—depending on the adhesions' extent and based on the procedure's documentation.

Documentation is crucial as the surgeon must describe the adhesions in the same manner that a writer describes a situation in a novel. It must tell a story giving a clear picture describing the difficulty encountered in the procedure. Did the adhesions distort the anatomy? Were they dense and fibrous? How much time was spent removing the adhesions before seeing the surgical field?

For example, the physician's documentation might specify: "There were dense adhesions from the bladder to the uterus appearing to have grown to the patient's uterus from a prior cesarean. These were carefully dissected with the Harmonic scalpel. Approximately one hour of extra operating time was utilized in attempting to dissect the bladder from the uterus. This was very tedious given that the adhesions were so dense and there was not a good operating plane and this made the dissection very difficult."

In this case, appending modifier 22 to the primary procedure code is justified, along with a request for additional payment based on the unusually difficult or time-consuming nature of the procedure.

When coding separately for adhesions using a dedicated CPT® code, select an appropriate code based on location:

- ❑ Tubes and ovaries, 58660 *Laparoscopy, surgical; with lysis*

of adhesions (salpingolysis, ovariolysis) (separate procedure) or 58740 Lysis of adhesions (salpingolysis, ovariolysis)

- ❑ Peritoneal or pelvic viscera, 58662 *Laparoscopy, surgical; with fulguration or excision of lesions of the ovary, pelvic viscera, or peritoneal surface by any method*
- ❑ Intrauterine, 58559 *Hysteroscopy, surgical; with lysis of intra-uterine adhesions (any method)*
- ❑ Labial, 56441 *Lysis of labial adhesions*
- ❑ Urethral, 53500 *Urethrolisis, transvaginal, secondary, open, including cystourethroscopy (eg, postsurgical obstruction, scarring)*
- ❑ Intestinal adhesions, 44005 *Enterolysis (freeing of intestinal adhesion) (separate procedure) or 44180 Laparoscopy, surgical, enterolysis (freeing of intestinal adhesion) (separate procedure)*

For example, significant dense adhesions were dissected from the omentum to the anterior abdominal wall and left pelvic sidewall. In this case, report 44180. ■



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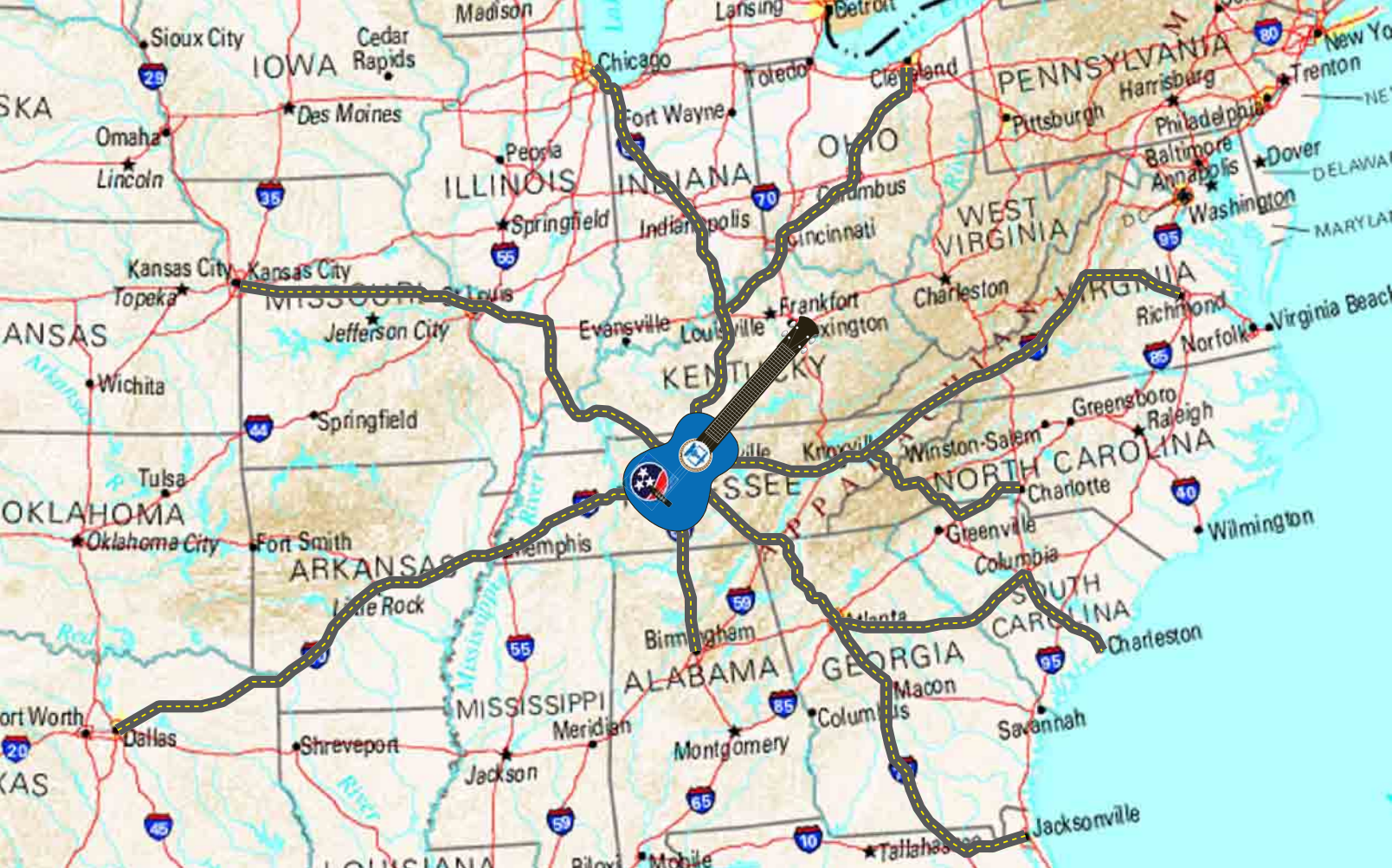
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Cynthia Irene Neavez, CPC Santa Ana CA
Paul Donald Aragones Apusen, CPC,
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 Ginger Caulder, CPC Trinity NC
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 Kristin Marie Jenkins, CPC Endicott NY
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 Brooklyn Diane Krapp, CPC N. Canton OH
 Deborah Kay Rudish, CPC N. Canton OH
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Dana Conley, CPC-A Newman GA Kim Geiss, CPC-A Peachtree City GA Candace K Kraus, CPC-A Savannah GA Dawn Long, CPC-A Suwanee GA Jill Bledsoe, CPC-A Woodstock GA Kim Trotta, CPC-A Woodstock GA Ashley Agpaoa, CPC-A Ewa Beach HI Lari Anne Kamei, CPC-A Honolulu HI Jana Miller, CPC-A Ankeny IA Amelia J Cox, CPC-A Council Bluffs IA Natalie Lamp, CPC-HA Council Bluffs IA Christina D Osborne, CPC-A Council Bluffs IA Lynne A Reed, CPC-A Des Moines IA Lynn Sherwood, CPC-A Des Moines IA Christine McKibben, CPC-A Waukee IA Amber Andrews, CPC-A Boise ID Cathy Grako, CPC-A Meridian ID Nancy Owens, CPC-A Meridian ID Cheryl Reed, CPC-A Meridian ID Johanna Kratt, CPC-A Star ID Sarah Jane Eveland, CPC-A Apple River IL Luellyn Cherry, CPC-A Arcola IL Dawn Stafford, CPC-A Bartonville IL Shanda Michelle Strawkas, CPC-A Buffalo IL Theresa Brewis, CPC-A Cary IL Tanya Bybee, CPC-A Cary IL Julie Scott, CPC-A Cary IL Vanessa Alison Flanagan, CPC-A Chicago IL Trina M Jackson, CPC-A Chicago IL Laura Kubitz, CPC-A Chicago IL Anette Martinez, CPC-A Chicago IL Orlana Pero, CPC-A Chicago IL Beth Rudat Devaney, CPC-A Crystal Lake IL Julie Ann Rugh, CPC-A Dixon IL Jessica Lynn Joniak, CPC-A Duplo IL Joanna Tkacz, CPC-A Fox River Grove IL Amber Rose Gill, CPC-A Freeport IL Pamela Masek, CPC-HA Glen Ellyn IL Rene Hartman, CPC-A Granite City IL Yvette Hinton, CPC-A Granite City IL Sarah Milburg, CPC-A Greenfield IL Sarah Johnson, CPC-A Harvard IL Nancy S Hendrix, CPC-A Hindsboro IL Amanda Kay Whitley, CPC-A Humboldt IL Michele Klot, CPC-A Joliet IL Michelle Valentino, CPC-A Lansing IL Karen Lynne Smith, CPC-A Mattoon IL Melissa Russo, CPC-A Monee IL Sherry Stoka, CPC-A Monee IL Tiffany Briggs, CPC-A Montgomery IL Marlena A. 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CPC-A Lexington KY Tara Elaine McNary, CPC-A Lexington KY Debra Lynn Moore, CPC-A Lexington KY Rachael Powers, CPC-A Lexington KY Rachelle Powers, CPC-A Lexington KY Jennifer Thompson, CPC-A Lexington KY Melissa Nicole VanHoose, CPC-A Lexington KY	Constance Ward, CPC-A Lexington KY Bonitta Lynn Zewicke, CPC-A Lexington KY Shimika Shantee Ashby, CPC-A Louisville KY Rebecca Sue Basham, CPC-A, CPC-HA Louisville KY Maja M Drane, CPC-HA Louisville KY Kaysi Gaddis, CPC-A Louisville KY Shannon R Griffiths, CPC-A Louisville KY Tiffany A Hutchens, CPC-A, CPC-HA Louisville KY Amber Christine Legler, CPC-A Louisville KY Shannon Marie Miller, CPC-A, CPC-HA Louisville KY Kamie Montague, CPC-A Louisville KY Davida Yvonne Nathan, CPC-HA Louisville KY Odettys Dramas, CPC-A Louisville KY Denise Darlene Phegley, CPC-HA Louisville KY Tiffany Monet Vaughn, CPC-A, CPC-HA Louisville KY Kathy Wheatley, CPC-A Louisville KY Faye Stumbo, CPC-A Mc Dowell KY Deborah Dawn King, CPC-A Midway KY Brittany Frye, CPC-A Mt Washington KY Hope Ann Wilson, CPC-A Nicholasville KY Amy Ely, CPC-A Perryville KY Karen Wetheing, CPC-A Perryville KY Tanya Renee King, CPC-A, CPC-HA Shelbyville KY Tiffany Sue Massie, CPC-A Taylor Mill KY Rebecca N Keeney, CPC-A Waco KY Shasta Nash, CPC-A Whitesville KY Xochi K Colbert, CPC-A Wichita KY Brittany Nicole Duell, CPC-A Bosner City LA Christine Rauber, CPC-A Hammond LA Kahala Marie Latson, CPC-A Shreveport LA Stacy Lauren Lawson, CPC-A Shreveport LA Margot Metyour, CPC-A Shreveport LA Jasmine Monique Rachal, CPC-A Shreveport LA Jackquinetta Michelle Randell, CPC-A Shreveport LA Stephanie Page Smith, CPC-A Shreveport LA Eva Margaretta Zachary, CPC-A Walker LA Ann Monroagie, CPC-A Andover MA Shelle Roney, CPC-A Cambridge MA Christine Zavala, CPC-A Charlestown MA Scott Anthony Sylvia, CPC-A Dartmouth MA Kathleen Mularski, CPC-A Easthampton MA Kimberly Stone, CPC-A Holden MA Robyn Mary Rouleau, CPC-A Littleton MA Kim Franklin, CPC-A Lowell MA Nancy Dion, CPC-A Mansfield MA 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R Hocht, CPC-A Charlotte NC Heather Kreider, CPC-A Charlotte NC Hannah M Lewis, CPC-A Charlotte NC Carla Marques, CPC-A Charlotte NC Josephine Ogbonna, CPC-A Charlotte NC Catherine Jean Puett, CPC-A Charlotte NC Susan Rehley, CPC-A Charlotte NC Antonia Wilson, CPC-A Charlotte NC Susan Nichole White-Fisher, CPC-A Cherryville NC Beth Cruise, CPC-A Concord NC Ashley Brooke Oakley, CPC-A Creedmoor NC Lori Ann Fenner, CPC-A Durham NC Anne Tempest, CPC-A Durham NC Sheryl Williams McAdams, CPC-A Elon NC Rachel Allen, CPC-A Graham NC	Sandra White, CPC-A Graham NC April W LeClear, CPC-A Harrisburg NC Jill Johnson, CPC-A Hendersonville NC Ellen Helper Stone, CPC-A Indian Trail NC Dana Jasper, CPC-A Jacksonville NC Deborah Walling, CPC-A Lenoir NC Cynthia Martin, CPC-A Locust NC Lisa Combs, CPC-A Matthews NC Lauren Griffin, CPC-A Matthews NC Cheryl Anne Johnston, CPC-A Matthews NC Myra Ringl, CPC-A Matthews NC Lynn Bodine, CPC-A Mebane NC Betty Bush, CPC-A Mebane NC Alicia Spaulding, CPC-A Mebane 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Monmouth Junction NJ Sharl Tucker, CPC-A Monroe Township NJ Catherine Diane Visconti, CPC-A
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Monroeville NJ
Kara Butala, CPC-A Neptune NJ
Nancy Goldman, CPC-A Rumson NJ
Donna Dolan, CPC-HA Toms River NJ
Priti Kumar, CPC-A Toms River NJ
Robert S Brannon, CPC-A Albuquerque NM
Valerie Crawford, CPC-A Albuquerque NM
Doreen Ogard, CPC-A Albuquerque NM
Bernadette Pacheco, CPC-A Albuquerque NM
Michael Scott Walker, CPC-A Albuquerque NM
Diane Garcia, CPC-A Rio Rancho NM
Patricia Sue Westfall, CPC-A Roswell NM
Kristie Renae Vacca, CPC-A Henderson NV
Shonna Bayer, CPC-A Las Vegas NV
Justin R Spencer, CPC-A Angola NY
Joan A Burnett, CPC-A Bainbridge NY
Michele C Coughlin, CPC-A Baldwinsville NY
Heather B Heath, CPC-A Baldwinsville NY
Megan Toman, CPC-A Ballston Lake NY
Suzanne Mary Barnes, CPC-A Ballston Spa NY
Lisa S Berard, CPC-A Binghamton NY
Lorrie A Hagerman, CPC-A Binghamton NY
Marion Louise Hiliert, CPC-A Binghamton NY
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Claudia Milena Luna, CPC-A Briarwood NY
Annette A Bazile, CPC-A Brooklyn NY
Nicole DeLucia, CPC-A Brooklyn NY
Michele-Ann E Townsend, CPC-A Brooklyn NY
Kimberly Lee, CPC-A Buffalo NY
Tara B Watkins, CPC-A Buffalo NY
Lauri J Webb, CPC-A, CPC-HA Buffalo NY
Ronda Tompkins, CPC-A Cameron Mills NY
Ashlee Kay Mawhiney, CPC-A Campbell NY
Gina Theresa Wyffels, CPC-A Canandaigua NY
Teresa Mech, CPC-A Cato NY
Victoria Rodgers, CPC-A Centereach NY
Paulette M Heisler, CPC-A Cheektowaga NY
Linda Daly, CPC-A Chester NY
Michelle Holt-Jarmacz, CPC-A Chittenango NY
Barbara Kindler, CPC-A Clifton Park NY
Jane F DeMaine, CPC-A Conklin NY
Jackie Malinowski, CPC-A East Amherst NY
Rebecca Orme, CPC-A Elmira NY
Kimberly Q Budney, CPC-A Endwell NY
Patricia Ann Amittstead, CPC-A Fort Plain NY
Amber LaFray, CPC-A Fulton NY
Kristin Schaefer, CPC-A Glenmont NY
Lori Weaver, CPC-A Greenwich NY
Marie Ann Whittaker, CPC-A Guilford NY
Carol R Benjamin, CPC-A Hilton NY
Debra Annmarie Steele, CPC-A Jamaica NY
Patricia W Kohn, CPC-A Johnson City NY
Mary C Smith, CPC-A Jordan NY
Clarissa Campbell, CPC-A Lackawanna NY
Laura Soldani, CPC-A Latham NY
Janelle Grace Shafer, CPC-A Lisle NY
Barbara J Lottio, CPC-A Liverpool NY
Sherry Ann Kenjersky, CPC-A Malden-on-Hudson NY
Sheri Lynn Noble, CPC-A Mattydale NY
Cynthia R Robert, CPC-A Mexico NY
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Margaret Moore, CPC-A Monticello NY
Donna L Smith-O'Connell, CPC-A Moravia NY
Koravia Nys
Maran Matos, CPC-A New York NY
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Ruth Ellen Thompson, CPC-A Odessa NY
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Tracy Ann Luchsinger, CPC-A Syracuse NY
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Kristine Elaine Kirchner, CPC-A Bedford OH
Melena D Hayes, CPC-A Boardman OH
Scott Storey, CPC-A Broadway Heights OH
Martha Hill, CPC-A Cincinnati OH
Thomas Michael Weber, CPC-A Cincinnati OH
Walisa Brown, CPC-A Cleveland OH
Susan Buchanan, CPC-A Cleveland OH
Angelina Turner, CPC-A Cleveland OH
Renee Weber, CPC-A Cleveland OH
Donna Snell, CPC-A Columbus OH
Barbara Lane, CPC-A Elyria OH
Kelly E Noel, CPC-A Gahanna OH
Judith E Lemmon, CPC-A Girard OH
Teia Nichole Semrock, CPC-A Holland OH
Ashley Renee Cincola, CPC-A Hubbard OH
Katharine Gedeon, CPC-A Latham OH
Jami L Wolf, CPC-A Lima OH
Janet L Fairhurst, CPC-A Louisville OH
Diane Marie Thompson, CPC-A Louisville OH
Rebecca Ruth Daniel, CPC-A Massillon OH
Andrea Cincola, CPC-A Masury OH
Dawn Hildgreve, CPC-A Minster OH
Laura Summy, CPC-A Mogadore OH
Christine Clark, CPC-A Monroe OH
Florence Paisley, CPC-A Newton Falls OH
Timothy L Moff, CPC-A Niles OH
Teena Credico, CPC-A Oregon OH
Anata Renee Cooper, CPC-A Painesville OH
Stacy Scarberry, CPC-A Pataskala OH
Kimberly Ann Plaeck, CPC-A Perrysburg OH
Janice M Zana, CPC-A Perrysburg OH
Gina Coman, CPC-A Powell OH
Angela Marghuette Molyneux, CPC-A Richfield OH
Joshua Seigley, CPC-A Rittman OH
Pamela Roberts, CPC-A Seven Hills OH
Natasha Nicole Moore, CPC-A Toledo OH
Randall Smith, CPC-A Toledo OH
Mona Patterson, CPC-A Westlake OH
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Janice M Zana, CPC-A Willoughby OH
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Ramola Rajagopal, CPC-A Tulsa OK
Angel Westbrook, CPC-A Tulsa OK
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Darla Bush, CPC-A Beaverton OR
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Janet Zancanella, CPC-A Bend OR
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Tammi Jane Lock, CPC-A Lyons OR
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Mihaela Vonica, CPC-A Portland OR
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Tiffany Wilson, CPC-A Salem OR
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Joan L North, CPC-A Ambridge PA
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Stacy Lynne Rider, CPC-A Dillsburg PA
Danielle Maguire, CPC-A Dover PA
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Lonnie Jean Chivers, CPC-A Felton PA
Donna M Smith, CPC-A Glenside PA
Sarah L Hayman, CPC-A Greenville PA
Paula A Duffy, CPC-A Henryville PA
Nicole Fetterolf, CPC-A Howard PA
Amber Imboden, CPC-A Hummelstown PA
Anuradha Ramaraju, CPC-A Hummelstown PA
Shawna Marie Milbourne, CPC-A Jacobus PA
Jayma Hower, CPC-A Lancaster PA
Susan A Holler, CPC-A Londesterg PA
Alyson R Willis, CPC-A Manchester PA
Margaret Kocher, CPC-A Marysville PA
Pam Harding, CPC-A Mechanicsburg PA
Donna Jean Grimm, CPC-A Mechanicsburg PA
Angela Dianne Zimmerman, CPC-A Mechanicsburg PA
Phyllis Long, CPC-A Mount Joy PA
Judy Sawtelle, CPC-A Olanta PA
Betty Shiland, CPC-A Philadelphia PA
Jennifer A Modderman, CPC-A Quarryville PA
Jamie S Rolon, CPC-A Reading PA
Shannon R Leonard, CPC-A Red Lion PA
Rebecca Stevens, CPC-A Red Lion PA
Mary A White, CPC-A Red Lion PA
Amanda Dean, CPC-A Sayre PA
Candy Davis, CPC-A Temple PA
Donna Accetta, CPC-A Walnutport PA
Nancy Carol Keener, CPC-A Wernersville PA
Lori Hoffman, CPC-A York PA
Susan E Lahoud, CPC-A York PA
Evangela Paloukas, CPC-A Riverside RI
Alissa Meagan Da Silva, CPC-A Warwick RI
Melissa Reynolds, CPC-A Westerly RI
Vickie Richardson, CPC-A Bishoptown SC
Tiffany Wiley, CPC-A Bishopville SC
Annie Lee Sallee, CPC-A Charleston SC
Thomasseen Patricia Williams, CPC-A Charleston SC
Yulanda W Berry, CPC-A Clover SC
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Shanitra Rokasha Mason, CPC-A Columbia SC
Pamela S Correll, CPC-A Effingham SC
Colleen Lodato, CPC-A Greer SC
Sharon Pruitt, CPC-A Hanahan SC
Amie Ann Wheat, CPC-A Lake City SC
Susie A Akron, CPC-A Lexington SC
Jodi Lowder, CPC-A Orangeburg SC
Melissa Pontoko Boyd, CPC-A Simpsonville SC
Dana Hice, CPC-A Simpsonville SC
Patricia Hawkins, CPC-A Spartanburg SC
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Version 5010: More Than a Software Update

Without Version 5010, ICD-10 implementation can't happen at your practice.

By Deborah Grider,

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In February's Road map to ICD-10, we focused on ICD-10's impact on your practice or facility and how to get ready. Now, let's focus on the impact of Version 5010 implementation.

Version 5010 of the electronic data interchange (EDI) must be implemented no later than Jan. 1, 2012. Lately, you might see a focus on getting ready for 5010 implementation. This is an important first step to ICD-10 implementation success.

Know 5010's Importance

If you are unfamiliar with Version 5010, here is its background. The Health Care Insurance Portability and Accountability Act (HIPAA) requires the Secretary, U.S. Department of Health and Human Services (HHS) to adopt standards for all covered entities to use when conducting certain health care administrative transactions electronically. These include claims, remittance, eligibility, and claims status requests and responses. The current transaction standard is x12 Version 4010A. This version is outdated and will not work with ICD-10. Version 5010 is marked for improvement. According to HHS proposed rule (*Federal Register*, Vol. 73, No. 164, Aug. 22, 2008), "operational and technical gaps still exist in Version 4010A. In addition, it has been more than 5 years since implementation of the original standards, and business needs have evolved during this time." To migrate to ICD-10, Version 5010 implementation is necessary as Version 4010A cannot accommodate the expanded code sets of ICD-10-CM and ICD-10-PCS.

Benefits of Transitioning to 5010

The switch to Version 5010 EDI architecture allows for transaction differentiation between ICD-9-CM and ICD-10-CM/PCS. Many of Version 5010's changes will correct deficiencies in Version 4010A.

Version 5010 has four basic changes from 4010A:

- Front matter—identifies the purpose and business information related to transactions.
- Technical—assures that transmitted data is more understandable.
- Structural—modifies the physical components of the transaction. For example, the name segment which includes a first, middle, last name, and name prefix and suffix.
- Data content improvement—allows for ICD-10-CM/PCS code sets support.

Version 5010:

- Improves clarity in provider loops (or fields);
- Supports ICD-10-CM/PCS;
- Clarifies National Provider Identifier (NPI) instructions;
- Requires guarantor/dependent information on eligibility responses;
- Improves coordination of benefit (COB) transactions by telling payers which transactions are primary versus secondary, enabling correct provider payment during the initial submission;
- Reduces "syntax error" related denials;
- Improves tracking;
- Allows for multiple identifiers;
- Limits responses to the claims where an inquiry is made;
- Introduces 45 new service type codes; and
- Provides improved usability for eligibility transactions (specifically the 270 and 271 eligibility responses).

Electronic transaction code sets are used in the physical transmission of health care data. ICD-10-CM will be the code set used to identify specific diagnoses in submission of claims, related transactions, and clinical reporting.

Table A: Timeline for Version 5010 and ICD-10 Implementation

Target Date	Milestone
January 2009	Begin level 1 activities (gap analysis, design, and development).
January 2010	Begin internal testing for version 5010. Begin initial ICD-10 implementation and compliance activities.
December 2010	Achieve level 1 compliance (covered entities have completed internal testing and send and receive compliant transactions; includes software vendors, providers, and clearinghouses).
January 2011	Begin level 2 testing activities (external testing with trading partners and move into production: dual 4010A1/5010 processing mode).
Jan. 1, 2012	Full compliance with 5010. Transition must be complete.
Oct. 1, 2013	Full compliance with ICD-10. Compliance must be complete. ICD-9-CM codes will not be accepted for service dates on or after Oct. 1, 2013.

Because Version 4010A cannot accommodate the seven digits of specificity that exists in ICD-10 (versus the five digits in ICD-9), Version 5010 is a prerequisite to ICD-10-CM and ICD-10-PCS implementation.

Version 5010 also promises to decrease the time staff currently spend looking up information and making phone calls to verify eligibility, claim denials, and appeals.

Ensure Readiness

Version 5010 is more than a software update. Many organizations will require practice management and electronic health record (EHR) system upgrades. The American Recovery and Reinvestment Act of 2009 (ARRA) financial incentives for physicians who adopt an EHR make this a great time to do it. As a bonus, the conversion will drive automation and increase reporting of quality performance measures. This is something to think about considering administrative and clinical data may be required for quality measures in the future. Clinical data could be the driving factor for payment of claims and performance bonuses.

If you think your vendor will contact you with the upgrade, you are wrong. You must contact your vendor and find out its progress. Ask your vendors for guidance, “What do I need to do to get ready?” Again, this is not a simple software upgrade. If you don’t implement 5010 by the deadline, your claims will not be processed and this will affect the financial health of your organization.

Important: *DO NOT* expect regulatory delays for Version 5010 or ICD-10 implementation—CMS begins testing 5010 this spring. Non-compliance of this HIPAA mandate is punishable by fines, which are a minimum of \$100 per transaction, up to \$50,000 a year annually, per transaction. Get on your vendor’s schedule for guidance, implementation, testing, and training.

For Version 5010 and ICD-10 implementation industry milestones, see **Table A**.

Typically, these activities are performed by your vendors. If your organization employs information technology (IT) staff, who either have built or customized your system(s), it is important to understand what activities must occur. If you are using vendors for your systems, including practice management, financial, EHR, etc., it is important to have an idea where they are in the process toward compliance.

Level 1 activities include:

- Timeline development
- Gap analysis
- Project charters, budgets, and work plans
- System design specification
- Development and internal testing
- Software delivery
- Internal testing (provider)
- Transaction certification in preparation for level II activities
- Begin ICD-10 implementation activities

Level 2 activities include:

- External testing between trading partners (provider, clearinghouse, and payers)
- Migration to production following successful testing with each payer
- Begin ICD-10 implementation activities
- Full compliance

Organization-wide training is crucial after implementation and testing, not only for the vendors but for anyone involved in the billing process for new content usage. To assure individuals can properly handle the transactions after Jan. 1, 2012, train them well in advance.




Version 5010 Implementation Tips:

Start early	Begin the process now
Perform a gap analysis (This is CRITICAL)	Identify new content applicable to your organization. Identify deleted content—how does it impact your organization? Identify changed content. Identify business issues and determine their impacts.
Engage your vendors early	Identifying issues early provides the vendor with time to react to the problems or issues at hand. Vendors may view a guide requirement or situation differently than the provider. Be persistent with your requirements and interpretation.
Communication	Communicate and coordinate with your trading partners early and often. Contact all your vendors for their timeline and roll-out plan. Push them for timely delivery of HIPAA compliant solutions. Contact trading partners to determine readiness and testing. Collaborate with vendor to resolve issues. Join your vendor user-group meetings—this also will help with ICD-10 implementation issues. Resolve business issues early and communicate solution to your trading partners. Many business problems can be averted if identified early.
Testing	Early testing with trading partners is critical. It is important to understand testing timelines to coordinate with the organization. Determine if you need new contract agreements. Review payer specifications outlining their expectations. Make necessary adjustments and resolve problems with payers. Address other technical or business-related issues.
Implementation	Start with your highest volume payer and test with production data. Resolve all problems and differences and move into production. As payers become ready, repeat the process with each payer. Monitor progress to ensure you have all payers into production by January 2012—this might take many months. Test again with several payers closer to the compliance date.

Time to Assess Vendors

Engage your vendors now for 5010 implementation. If a vendor says they will not be ready or do not have a timeline established, think about changing vendors. Find out if your vendors are providing this update at “no charge” or if there is a fee for the update.

Remember: It is *YOUR* responsibility to ensure HIPAA compliance, not the vendor. Get ready. Get set. Implement! 

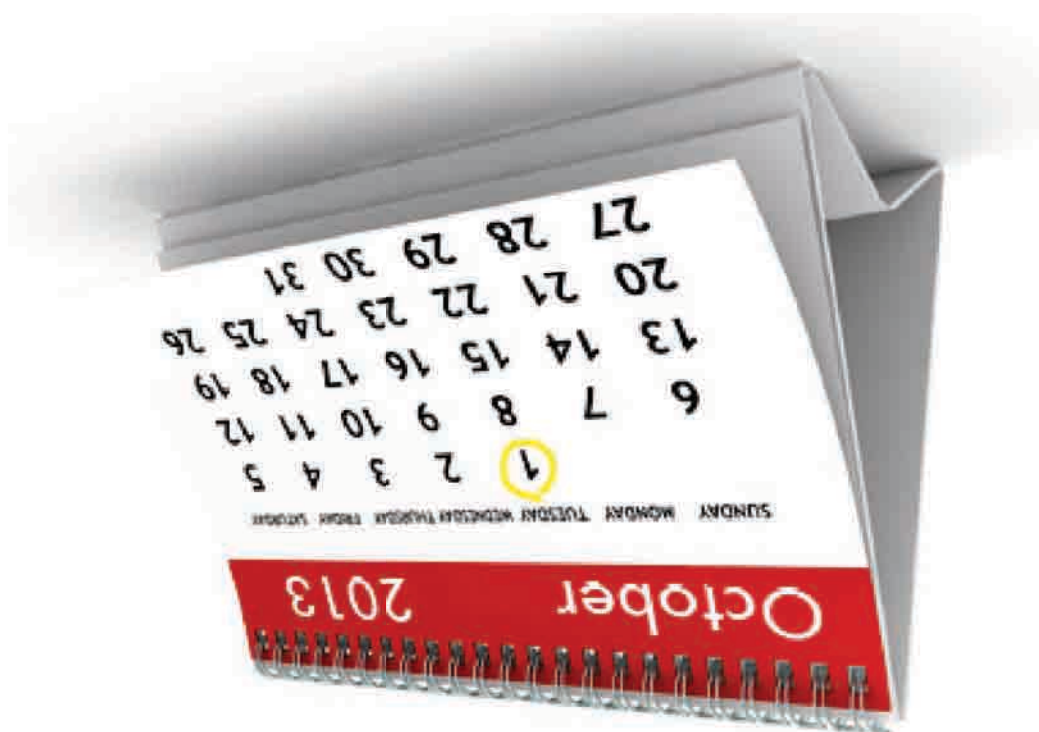


Deborah Grider, CPC, CPC-H, CPC-I, CPC-P, CPMA, CEMC, COBGC, CPC-D, CCS-P, is the AAPC's vice president of strategic development and the former AAPC National Advisory Board president. Deborah is the author of *ICD-10-CM Implementation Guide, Make the Transition Manageable*, American Medical Association Press, 2009.

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2010 PQRI Moves Forward

CMS adds more measures and new reporting mechanisms to maximize revenue and patient care.

By Julie Orton Van, CPC, CPC-P, CEMC, CGSC, COBGC

Quality



Each year, the Centers for Medicare & Medicaid Services (CMS) implements the Physicians Quality Reporting Initiative (PQRI) through a rulemaking process published in the *Federal Register*. In general, CMS has responded positively to provider feedback and continues to provide educational opportunities and implementation resources to encourage better participation. They have endeavored each year to address system and reporting difficulties.

For 2010, PQRI includes several key changes, including:

► More Quality Measures

For 2010, CMS adds 30 new, individual PQRI measures and six measures groups on which individual eligible professionals (EPs) may report. The added individual measures are identified in table 13 (pages 93 and 94) of the Nov. 25, 2009 *Federal Register*. The six new measures groups include:

- Coronary Artery Disease (CAD)
- Heart Failure
- Ischemic Vascular Disease (IVD)
- Hepatitis C
- Human Immunodeficiency Virus (HIV)/Acquired Immune Deficiency Syndrome (AIDS)
- Community Acquired Pneumonia (CAP)

A complete listing of 2010 measures groups may be found in the Nov. 25, 2009 *Federal Register*, tables 15-27 (pages 97-103).

► Group Practice Reporting

Group practices that satisfactorily report data on PQRI measures are eligible to earn a PQRI incentive payment equal to 2 percent of the group practice's total estimated Medicare Physician Fee Schedule (MPFS) allowed charges for covered professional services furnished during the 2010 reporting period. For instance, if the group practice meeting the participation criteria successfully reports total estimated allowed MPFS charges of \$940,000, the practice's total earned incentive amount would be \$18,800.

To participate in the 2010 PQRI group practice reporting option (GPRO), a group practice—defined as “consisting of 200 or more individual EPs who have reassigned their billing rights to the TIN [Tax Identification Number]”—must have submitted a self-nomination letter to CMS prior to Jan. 31, and must have been selected to participate in the 2010 PQRI GPRO.

Each group practice selected to participate in the 2010 PQRI GPRO is required to report 26 quality measures, from five measures groups unique to the GPRO:

1. Diabetes Mellitus (DM) Disease Module (eight measures)
2. Heart Failure (HF) Disease Module (seven measures)
3. Coronary Artery Disease (CAD) Disease Module (four measures)
4. Hypertension (HTN) Disease Module (three measures)

5. Preventive (Prev) Care Measures (four measures, individually sampled)

The reporting mechanism is a pre-populated data collection tool CMS provides. Group practices must complete the tool for the first 411 consecutively-ranked and assigned patients in the order in which they appear in the group's sample for each disease module or preventive care measure.

As in past years, EPs who are reporting as individuals do not need to sign up or pre-register to participate in the PQRI. To participate, EPs may choose to report information on individual PQRI quality measures or measures groups to CMS:

- (1) On their Medicare Part B claims,
- (2) Through a qualified PQRI registry, or
- (3) Via a qualified electronic health record (EHR) product.

Individual EPs who meet the criteria for satisfactory submission of PQRI quality measures data using any of these reporting mechanisms for services furnished during a 2010 PQRI reporting period will qualify to earn a PQRI incentive payment equal to 2 percent of their total estimated MPFS-allowed charges for covered professional services furnished during the reporting period. For example, if Dr. Doe reports a sufficient number of measures, reported at 80 percent, and his total estimated allowed MPFS charges are \$80,000, his total earned incentive amount would be \$1,600.

PQRI Background

The 2006 Tax Relief and Health Care Act (TRHCA) (P.L. 109-432) required the establishment of a physician quality reporting system, including an incentive payment for eligible professionals who satisfactorily report data on quality measures for covered professional services furnished to Medicare beneficiaries during the second half of 2007 (the 2007 reporting period). CMS named this program the Physician Quality Reporting Initiative (PQRI). The PQRI was further modified as a result of the Medicare, Medicaid, and State Children's Health Insurance Program (SCHIP) Extension Act of 2007 (MMSEA) (Pub. L. 110-275) and the Medicare Improvements for Patients and Providers Act of 2008 (MIPPA) (Pub. L. 110-275).

The PQRI program requirements and measure specifications for the current program year are different from the PQRI program requirements and measure specifications for a prior year. EPs are responsible for ensuring they are using the PQRI documents for the correct program year.

An important note: An individual EP who is a member of a group practice selected to participate in the PQRI GPRO is not eligible to earn a separate, individual PQRI incentive payment. When a group practice (TIN) is selected to participate in the GPRO, this is the only PQRI reporting method available to the group and all individual NPIs who bill Medicare under the group's TIN.

■ EHR Reporting Mechanism

In addition to the claims-based and registry-based reporting mechanisms, CMS will accept PQRI quality measures data extracted from a qualified EHR product on 10 individual PQRI measures, and will—for the first time—allow EPs to count their submission of EHR-based measures toward their eligibility for a PQRI incentive payment.

The final rule provides that EPs who satisfactorily report data on at least three of the 10 EHR-based individual PQRI measures are eligible for an incentive payment. In previous years, EHR-based measure submission has been on a voluntary or pilot basis, and has not counted towards an EP's eligibility for an incentive payment. The addition of an EHR-based reporting mechanism is meant to promote the adoption and use of EHRs, and to provide EPs and CMS with experience on EHR-based quality reporting.

To qualify for PQRI reporting eligibility, a registry or EHR product must go

through a self-nomination and vetting process (if they are new to PQRI registry reporting), or must notify CMS of their desire to continue PQRI data submission in 2010 (if they were qualified in 2009 and successfully submitted their users' quality data). Some EHRs also can report the electronic prescribing measure. In addition to capturing the required data elements for the measure calculation, these qualified EHR products also can transmit the required information in the requested file format.

See the Resource Tips at the end of this article for a list of qualified registries for CMS 2010 PQRI reporting.

■ New, Six-month Reporting Period for Individual Measures

A six-month period for claims-based reporting of individual measures begins July 1. In prior years, the six-month reporting period was available only for measures group reporting or for registry-based reporting.

Success Depends on Meeting the Threshold

PQRI incentive payments are issued separately as a single consolidated incentive payment in the following year. Before an EP can receive an incentive payment for reporting 2010 quality data, however, he or she must meet specific reporting thresholds that depend on the reporting period and option used.

For those EPs who use the claims-

based reporting method of individual measure(s), CMS determines whether the provider reported quality data for measures satisfactorily as a general validation. After CMS has determined that the provider submitted valid quality data codes (QDCs), the agency determines if the EP should have submitted QDCs for additional measures using a two-step Measure-Applicability Validation (MAV) process.

For example, if the provider submits quality data for Measure 1, Diabetes Mellitus: Hemoglobin A1c Poor Control in Diabetes Mellitus, CMS will assume other measures related to care of patients with chronic diabetes mellitus are applicable to that practice.

Additional information on the MAV process can be found on the Analysis and Payment page of the PQRI section of the CMS website at www.cms.hhs.gov/PQRI.

PQRI Feedback Reports

Each year, the PQRI incentive payment and the PQRI feedback report are issued through separate processes. PQRI feedback report availability is not based on whether an incentive payment was earned. Feedback reports will be available for every TIN under which at least one eligible professional (identified by his or her NPI) submitting PFS claims reported at least one valid PQRI measure at least once during the reporting period. PQRI participants will not receive claim-level details in the feedback reports.

Following the distribution of 2010 incentive payments, CMS will (as required by the Medicare Improvements for Patients and Providers Act (MIPPA)) post on its website the names of EPs and group practices that satisfactorily report quality measures.

PQRI is a good way to maximize revenue while adding to data important for improved patient care. Although the group practice deadline has passed for 2010, individual EPs are still able to participate and earn payments for this year. And it's not too late for any practice to begin planning for 2011. ■



Julie Orton Van, CPC, CPC-P, CEMC, CGSC, COBGC, works at Ingenix as a product manager. She has more than 25 years experience in the health care industry, including physician office management, home health and hospice, managed care, laboratory services, physician and facility contracting, benefits administration, and claims payment, clinical information systems. Prior to Ingenix, she was a systems analyst for a fully integrated electronic medical record (EMR) at a large teaching hospital and health care system. She can be reached at Julie.Van@Ingenix.com.

Resource Tips:

The 2010 PQRI program was finalized in the 2010 PFS final rule with comment period (74 FR 61788 through 61844). The final regulation was published in the Federal Register on Nov. 25, 2009 (<http://edocket.access.gpo.gov/2009/pdf/E9-26502.pdf>).

A comprehensive array of PQRI resources is available on the CMS website. CMS educational resources include *MLN Matters* articles, PQRI Educational Products, PQRI National Provider Call PowerPoint Presentations, PQRI Tool-Kit, PQRI Tip Sheets, PQRI Fact Sheets, PQRI Portal User Guide, PQRI FAQs, physician listserves, implementation advice, a single-source code master, web-based training, and more.

Eligible Professionals

www.cms.hhs.gov/PQRI/Downloads/EligibleProfessionals.pdf

Group Practice Reporting Option

www.cms.hhs.gov/PQRI/22_Group_Practice_Reporting_Option.asp#TopOfPage

2010 Registry Requirements

[www.cms.hhs.gov/PQRI/Downloads/2010RegistryRequirementsFinal_1\(2\).pdf](http://www.cms.hhs.gov/PQRI/Downloads/2010RegistryRequirementsFinal_1(2).pdf)

2010 Qualified Registries

www.cms.hhs.gov/PQRI/Downloads/QualifiedRegistriesPhase1Rvdsd120709_1.pdf

2010 PQRI EHR Measure Specifications

www.cms.hhs.gov/PQRI/Downloads/2010_EHR_Measure_Specifications_121809.pdf

Qualified EHR Vendors for 2010 PQRI and Electronic Prescribing Incentive Programs

www.cms.hhs.gov/PQRI/Downloads/QualifiedEHRVendorsRvdsd01042010Final.pdf

Feedback Report Examples

www.cms.hhs.gov/PQRI/Downloads/2007Re-Runand2008PQRIFeedbackReportExamples.zip

Educational and Support Resources

www.cms.hhs.gov/PQRI/30_EducationalResources.asp#TopOfPage

www.cms.hhs.gov/PQRI/Downloads/PQRI-eRxEPQuickRefGuideDiagram_100209.pdf

www.cms.hhs.gov/MLNGenInfo/

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Acting Controller

Meet the AAPC Staff


Wei Guo

My name is Wei Guo, and I am from China. Before I came to the United States, I was a commercial loan officer for China Construction Bank, which is one of the four biggest banks in China. I received my master's degree in accounting from Utah State University.

I work in the finance department at AAPC as acting controller. My responsibilities include: financial report, human resource and payroll, and management of the Finance Department. Before I joined AAPC, my experience was mainly in the lending industry. It took me some time to learn about:

- Medical coding
- Our many credentials (CPC®, CPC-H®, CPC-P®, CIMC™, CCC™, CASC™, CGSC™, etc.)
- All kinds of medical terms (ICD-9, HCPCS, E/M, etc.)
- Each department (PMCC, conference, workshop, exam, CEU, etc.)
- Each service offered to our members

It's been three years since I joined AAPC and in that time I have been responsible for its financial health. I am amazed by the company's rapid growth and I am so proud when I see the membership increase and more variety of services provided to coders. I love working for AAPC.

In our department, we have Amy Romero and Dawn Eden doing the data entry, Jan Call doing mail fulfillment and check deposit, and Nicole Egbert doing accounts payable. When you send payments and applications by mail, Jan deposits the check payments and scans paper work into our database system. Our data entry team is responsible for applying your payments appropriately, and making sure all data is accurate in the system. We do our best to process your payments timely and accurately so you receive ordered books, register your online courses to prepare for exams, register for exams, and earn your credentials. We are a strong team, standing behind you with support and want your experience with AAPC to be positive. 



Left to right: Nicole Egbert, Amy Romero, Wei Guo, Dawn Eden, and Jan Call

Up Close and Personal

How do you spend your spare time?

In my spare time, I love cleaning my house and organizing stuff. I enjoy cooking healthy and nutritional meals for my family, watching my daughter ice skating, and playing piano. Vacations with my family are always enjoyable.

If you could do any other job what would it be?

I would like to be a professional organizer. I love everything to be neat, clean, and organized. Life would be wonderful with that.

CMS Rehabilitates CR, ICR, and PR Guidelines

By G. John Verhovshek, MA, CPC

Claiming these special services requires renewed understanding of their differences and similarities.

To comply with Medicare Improvements for Patients and Providers Act of 2008 (MIPPA) requirements, the Centers for Medicare & Medicaid Services (CMS) updated chapter 32 of the *Medicare Claims Processing Manual* to define coverage and appropriate coding for cardiac rehabilitation (CR) programs, intensive cardiac rehabilitation (ICR) programs, and pulmonary rehabilitation (PR) programs for Medicare beneficiaries. These updates are outlined extensively in the 2010 Medicare Physician Fee Schedule (MPFS) final rule, published in the Nov. 25, 2009 *Federal Register* (<http://edocket.access.gpo.gov/2009/pdf/E9-26502.pdf>).

Follow CR Rules

CR is a “lifestyle modification” program that aims to stabilize or reverse the progression of cardiovascular disease, and to reduce a patient’s heart disease or chance of a cardiac event or death. As defined in Publication 100-04, *Medicare Claims Processing Manual*, chapter 32, section 140 (revised Dec. 11, 2009), Medicare covers CR in a physician’s office or a hospital outpatient setting for patients who have experienced **at least** one of the following:

- Acute myocardial infarction within the preceding 12 months
- Coronary artery bypass surgery
- Current stable angina pectoris
- Heart valve repair or replacement
- Percutaneous transluminal coronary angioplasty (PTCA) or coronary stenting
- Heart or heart-lung transplant

To qualify for Medicare coverage, a CR program must include **all** of the following:

- Physician-prescribed exercise each day CR items and services are furnished;
- Cardiac risk factor modification, including education, counseling, and behavioral intervention at least once during the program, tailored to patients’ individual needs;

- Psychosocial assessment;
- Outcomes assessment; and
- An individualized treatment plan detailing how components are utilized for each patient.

The 2010 MPFS final rule further specifies, “The items and services furnished by a CR program are individualized and set forth in written treatment plans that describe the patient’s individual diagnosis; the type, amount, frequency, and duration of items and services furnished under the plan; and the goals set for the individual under the plan. **These written plans must be established, reviewed, and signed by a physician every 30 days.**” [emphasis added]

Regulations limit CR programs to a maximum of two, one-hour sessions per day, to a maximum total of 36 sessions within 36 weeks. An additional 36 sessions over an extended time also may be covered, if approved specifically by the local Medicare contractor.

To report CR services, call on CPT® 93797 *Physician services for outpatient cardiac rehabilitation; without continuous ECG monitoring (per session)* or 93798 *Physician services for outpatient cardiac rehabilitation; with continuous ECG monitoring (per session)*, depending on whether electrocardiogram (ECG) monitoring occurs.

Providers should document the length of each CR session (ideally, this would include both start and stop times). The minimum time requirement to report an initial session is 31 minutes. To report two CR sessions on the same day, however, the minimum combined CR time must equal 91 (not 62) minutes. The *Medicare Claims Processing Manual* further specifies, “If several shorter periods of cardiac rehabilitation services are furnished on a given day, the minutes of service during those periods must be added together for reporting in 1-hour session increments.”

For example, if the patient receives 20 minutes of cardiac rehabilitation services in the day, CR may not be reported because the minimum time requirement was not met. If, however, the patient receives 20 minutes of cardiac rehabilitation services in the morning and 30 additional minutes later the same day, one session of CR may be reported.

In all cases, CR services must be provided under a physician’s direct supervision. That is, a physician must be immediately available and accessible for medical consultations and emergencies during all timed items. Documentation should reflect that this requirement has been met.

ICR Abides Slightly Different Guidelines

ICR includes the same items and services under many of the same conditions (listed above), including the physician supervision requirements, as a CR program. ICR sessions are, however, “furnished in highly structured environments in which sessions of the various components may be combined for longer periods of CR and may be more rigorous,” according to CMS in the 2010 MPFS final rule.

To gain necessary Medicare approval, an ICR program must demonstrate through peer-reviewed published research that it accomplished at least one of following for its patients:

- Positively affected the progression of coronary heart disease
- Reduced the need for coronary bypass surgery
- Reduced the need for percutaneous coronary interventions

According to the *Medicare Claims Processing Manual*, an ICR program also must “demonstrate through peer-reviewed published research that it accomplished a statistically significant reduction in five or more of the following measures ...”

- Low-density lipoprotein
- Triglycerides
- Body mass index (BMI)
- Systolic blood pressure
- Diastolic blood pressure
- The need for cholesterol, blood pressure, and diabetes medication

HCPCS Level II gained two new codes in 2010 for reporting ICR services: G0422 *Intensive cardiac rehabilitation; with or without continuous ECG monitoring, with exercise, per hour, per session* and G0423 *Intensive cardiac rehabilitation; with or without continuous ECG monitoring, without exercise, per hour, per session*.

Frequency rules differ for CR, ICR: Unlike a CR program, an ICR program may include up to 72, one-hour sessions, with up to six sessions per day, over a period of up to 18 weeks.

These are time-based codes and, as such, a minimum service time of 31 minutes is required to report the first unit of either G0422 or G0423, as follows:

Total Time	Total Units
< 31 minutes	0
31-90 minutes	1
91-150 minutes	2
151-210 minutes	3
211-270 minutes	4
271-330 minutes	5
> 331minutes	6 (daily maximum)

Once again, CMS says that if several shorter periods of ICR services are furnished on a given day, “the minutes of service during those periods must be added together for reporting in one-hour session increments.”

For example, if a patient receives 70 minutes of ICR services without exercise in the morning, and 95 additional minutes of ICR later that same day, correct coding would be G0423 x 3.

PR Coverage for COPD Patients


In addition to CR and ICR programs, Medicare offers coverage for PR items and services for patients with moderate to very severe chronic obstructive pulmonary disease (COPD) (those defined as GOLD classification II, III, and IV).

PR programs must be requested by the physician treating the COPD, and must include the following:

- Physician-prescribed exercise. Some aerobic exercise must be included in each pulmonary rehabilitation session;
- Education or training closely and clearly related to the individual’s care and treatment which is tailored to the individual’s needs, including information on respiratory problem management and, if appropriate, brief smoking cessation counseling;
- Psychosocial assessment;
- Outcomes assessment; and
- An individualized treatment plan detailing how components are utilized for each patient.

As with CR and ICR programs, PR items and services must be furnished in a physician’s office or in a hospital outpatient setting, and require a physician’s direct supervision.

A single HCPCS Level II code, G0424 *Pulmonary rehabilitation, including exercise (includes monitoring), per hour, per session*, reports PR services. A maximum of two, one-hour sessions may be reported per day. The minimum service time to report one hour of service is 31 minutes. The minimum service time to report two hours of service is 91 minutes.

For example, according to the *Medicare Claims Processing Manual*, “If the patient receives 70 minutes of pulmonary rehabilitation services in the morning and 85 minutes of pulmonary rehabilitation services in the afternoon ... report two sessions of pulmonary rehabilitation services under the HCPCS G code for the total duration of pulmonary rehabilitation services of 155 minutes. A maximum of two sessions per day may be reported, regardless of the total duration of pulmonary rehabilitation services.” 

[G. John Verhovshek, MA, CPC, is AAPC’s director of clinical coding communications.]

As with CR and ICR programs, PR items and services must be furnished in a physician’s office or in a hospital outpatient setting, and require a physician’s direct supervision.

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CMS Clarifies Meaningful Use and Eligible Providers

Criteria will be phased into three stages, each building upon another.

By Janice G. Jacobs, CPA, CPC, CCS, ROCC

EPs must participate in either the Medicare or Medicaid incentive program. Eligible hospitals may participate in both.

The term “meaningful use” in reference to the stimulus payment for electronic health records (EHRs) has been a source of confusion for providers who want criteria compliance with the incentive. To clarify further, Congress established the following three requirements for meaningful use:

1. Using EHRs in a meaningful manner
2. Interoperability to enhance the quality of care provided to (a) patient
3. The ability to report quality measures to the Centers for Medicare & Medicaid Services (CMS)

CMS plans on phasing the meaningful use criteria in three stages, building upon one another. The first stage begins in 2011, the second stage in 2013, and the third and last stage in 2015. Advances in health information technology (HIT) will be incorporated into each subsequent stage.

A brief overview of the three stages is as follows:

Stage 1—Involves standardizing health information into a coded format, tracking, incorporating clinical decision support tools, and reporting quality measures.

Stage 2—Includes all components of Stage 1 plus expands HIT use to improve quality of care, provides for the exchange of information in a structured format, and requires the ability to transmit diagnostic testing information.

Stage 3—Includes components of Stages 1 and 2 plus expands the meaningful use criteria for improved quality of care, safety and efficiency, and includes a means for patients to access their own records and self-help tools.

CMS also clarified that an eligible professional (EP) is a nonhospital-based physician who receives reimbursement from either Medicare or Medicaid and who uses certified EHR technology (CEHR). Each EP is entitled to receive an incentive payment individually, provided he or she meets the meaningful use criteria. This means it is true that each physician

in a group practice, regardless of the group's size, is eligible to receive the full incentive payment. EPs must participate in either the Medicare or Medicaid incentive program. Eligible hospitals may participate in both.

Hospital-based eligible professionals (HBEPs) are not eligible for incentive payments through the Medicare program. The reason being HBEPs such as pathologists, anesthesiologists, or emergency department (ED) physicians furnish services covered under the Medicare program during the hospital's reporting period and while using the hospital's facilities and equipment including the hospital's EHRs.

In the proposed rule, EPs who receive incentive payments in the first year have to satisfy Stage 1 requirements in 2011 and 2012. CMS will update the meaningful use criteria in time for the 2013 payment year and, as a result, Stage 2 criteria has to be met in 2013 and 2014 for corresponding incentive payments EP eligibility. Stage 3 criteria needs to be implemented in 2015 for EPs to receive their final incentive payment.

A complete breakdown of each stage of the meaningful use criteria is found in the “Summary of the Proposed Rule for the Medicare and Medicaid Electronic Health Records (EHR) Incentive Program (Eligible Professionals only)” found at: www.entnet.org/Practice/loader.cfm?csModule=security/getfile&pageid=77750.

Note: This article is a follow-up to “EHR Primer: Get the Basics,” pages 14-15, in the February 2010 *Coding Edge*. ■



Janice G. Jacobs, CPA, CPC, CCS, ROCC, is a director in Huron Consulting Group's Life Sciences Practice with over 25 years of health care billing, coding, and reimbursement experience. During her career, she has performed documentation, coding, billing, and charge description master (CDM) reviews. She recently served as interim director of coding compliance at a major West Coast academic medical center, where she worked extensively with the Radiation Oncology department. She is a certified public accountant licensed in Pennsylvania, and serves on the National Advisory Board (NAB) of the AAPC.

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