

LW Consulting, Inc.

CodingAlert

Coding & Audit Pitfalls:
Best Practices to Avoid Compliance Issues

May 2018

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DATES OF SERVICE	PROCEDURE CODE	
05/21/10-05/21/10	82272	PU
05/21/10-05/21/10	94010	PULMO
05/21/10-05/21/10	94375	CARDIOVASCULAR SE
05/21/10-05/21/10	93000	VENIPUNCTURE
05/21/10-05/21/10	36410	

Evaluation & Management: Complexities of Medical Decision Making

LW Consulting, Inc. (LWCI) has identified that within the components of Evaluation and Management (E&M) leveling, there are those that are more difficult than others to understand and apply. One component that, in our experience, has the most difficulty is in medical decision-making. In this CodingAlert, LWCI is offering new information for the novice E&M coder or new-entry practitioner, but we will also provide a refresher to those more experienced with the art of medical decision-making.

The Centers for Medicare and Medicaid Services (CMS) provides detailed and comprehensive guidelines for documenting and determining the appropriate level of medical decision-making as part of meeting the criteria for E&M services. While it is complex and can be somewhat confusing, CMS' 2017 "[Evaluation and Management Services](#)" guide is available for reference. In this CodingAlert issue, we provide an overview of medical decision-making.

An Overview of Medical Decision-Making:

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According to the CMS 2017 Evaluation and Management Services guide, the medical decision-making component is determined by three major factors:

1. The number of potential diagnoses and/or various management options;
2. The amount and complexity of data, such as diagnostics and medical records, that are reviewed or must be obtained; and
3. The level of risk associated with the patient's condition.

To inquire about coding education, medical record documentation or compliance auditing, contact Rob Senska by calling 609-249-3819 or email RSenska@LW-Consult.com.

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Additionally, the [CMS' guide](#) outlines four types of medical decision-making complexity which are ordered from level of least complexity to highest complexity:

Complexity	Description
Straightforward	Minimal or no amount and complexity of data reviewed, minimal diagnoses or management options, and a minimal level of risk
Low Complexity	Limited amount of complexity of data reviewed, limited diagnoses and management options, and a low level of risk.
Moderate Complexity	Moderate amount and complexity of data reviewed, multiple number of diagnoses or management options, and moderate level of risk.
High Complexity	Extensive amount and complexity of data reviewed, extensive number of diagnoses or management options, and a high level of risk.

Even though the CMS guide is not an end-all to the definitions and guidelines, E/M reporting can be somewhat subjective. The “factors and levels” language may seem clear and concise, but it may remain somewhat gray when the provider is identifying all the components that make up a solid picture of medical decision-making. CMS has offered the role of clarification to the coder, but they have also taken strides to help clarify and narrow that subjectivity by providing a table which indicates the different levels of E/M medical decision-making complexity with applicable examples.

A last but very important note: Complete, accurate and concise documentation is foundational to reflect all medical decision-making criteria performed during the E/M. Ambiguity helps no one. Clear and supportive documentation in a diagnosis format will help coders and providers determine the most appropriate level of complexity for each patient encounter.

Sources:

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/eval-mgmt-serv-guide-ICN006764.pdf>

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