

LW Consulting, Inc.

CodingAlert

Coding & Audit Pitfalls:
Best Practices to Avoid Compliance Issues

October 2018

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

Does Your Documentation Support Billing for Prolonged Services?

It happens—a patient’s simple visit turns into an extended appointment. In this situation, it is critical for providers to properly document and bill for prolonged services in the office or outpatient setting. Providers must understand and follow the applicable coding/reimbursement standards and ensure services are accurately documented to support a prolonged services billing/claim.

Properly Documenting Prolonged Services Codes

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In the 2017 Work Plan, the OIG stated that prolonged services are rare and unusual. Hence, a high volume of prolonged services may raise red flags, even when accompanying the correct companion E&M code. Billing of prolonged services codes continues to be under scrutiny in the 2018 OIG Work Plan as a focal area for government review and audit. Attention to how and why a prolonged service is added is warranted to be sure medical necessity meets Medicare requirements for payment.

Criteria for Documenting Prolonged Services: Time and Type

As a helpful reminder, please see below in chart criteria to properly code prolonged services.

Time

Time is the controlling factor when more than 50% of the total face-to-face time is spent in counseling and coordination of care. For prolonged services, start and stop times must always be documented.

Total Duration of Prolonged Services	Office or Outpatient Setting with Direct Patient Contact	Office or Outpatient Setting Without Direct Patient Contact
Less than 30 minutes	Not reported separately	Not reported separately
30–74 minutes (1 hr. 15 min–1 hr. 44 min.)	99354 X 1	99358 X 1
75–104 minutes (1 hr. 15 min–1 hr. 44 min.)	99354 X 1 AND 99355 X 1	99358 X 1 AND 99359 X 1
105 or more (1 hr. 45 min or more)	99354 X 1 AND 99355 X 2 or more for each additional 30 minutes	99358 X 1 AND 99359 X 2 or more for each additional 30 minutes

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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Total Duration of Prolonged Services	Office or Outpatient Setting with Physician or Other Qualified Professional Supervision
Less than 45 minutes	Not reported separately
45–74 minutes (45 minutes–1 hr. 14 min)	99415 X 1
75–104 minutes (1 hr. 15 min–1 hr. 44 min)	99415 X 1 AND 99416 X 1
105 or more (1 hr. 45 min or more)	99415 X 1 AND 99416 X 2 or more for each additional 30 minutes

Type

Three types of prolonged services categories:

With Direct Patient Contact	Without Direct Patient Contact	With Physician or Other Qualified Health Care Professional Supervision
Face-to-face and includes additional non face-to-face services in the office or other outpatient setting.	This service is to be reported in relation to either physician or other qualified provider that is neither face-to-face time in the office or outpatient setting.	This service is to be reported when the physician or qualified health care professional is present to provide direct supervision of the clinical staff.

With Direct Patient Contact	Without Direct Patient Contact	With Physician or Other Qualified Health Care Professional Supervision
To be reported on given date, even if the time spent by the physician or other qualified provider is non continuous.	This service may be reported on a different date than the primary service that it relates.	Code 99415 to be reported once per date, even if the time spent by the clinical staff is non continuous.
Code 99355 is an add-on code to 99354.	Code 99359 is an add-on code to 99358.	Code 99416 is an add-on code to 99415.

Sources:

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/mm5972.pdf>

https://www.aap.org/en-us/Documents/coding_prolonged_services.pdf

Avoid unnecessary costly withholds and audits. Make sure your documentation supports billing for prolonged services. To schedule a review of your documentation, contact Ron Senska by calling 609-249-3819 or email RSenska@LW-Consult.com.

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