

LW Consulting, Inc.

CodingAlert

Coding & Audit Pitfalls:
Best Practices to Avoid Compliance Issues

September 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	

CMS Proposes to Reduce Documentation Requirements for Teaching Physician Services

In the last CodingAlert, LW Consulting, Inc. identified specific proposed changes to the Physician Fee Schedule (PFS) for CY 2019. Highlighted below is the Centers for Medicare & Medicaid Services (CMS) proposed guidance for Evaluation and Management coding in the educational environment.

Additionally, we have included corresponding links for you to voice comments to CMS (accepted on/before 9/10/18).

An Overview of Suggested E/M Coding Changes in the Educational Environment

Prepared by: Steven Robinson, Director

CMS is proposing to relax the requirement for teaching physicians to personally document their participation in an Evaluation and Management service in the medical record. Currently, resident providers under the supervision of teaching physicians can document in the medical record. However, the teaching physician is required to personally document his or her involvement in the case.

In response to stakeholder feedback, suggesting that this process is duplicative and burdensome, CMS is proposing to change the requirements so that:

- The medical record must only reflect that the teaching physician was present at the time the service was furnished;

- The teaching physician does not have to be the one to document this information; and
- The physician, resident or nurse will be allowed to input the extent of the physician's participation into the medical record.

CMS will be accepting comments on the proposed rule until September 10, 2018:

Sources:

<https://www.gpo.gov/fdsys/pkg/FR-2018-07-27/pdf/2018-14985.pdf>

<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeeSched/index.html>

<https://www.cms.gov/Newsroom/MediaReleaseDatabase/Fact-sheets/2018-Fact-sheets-items/2018-07-12-2.html>

LW Consulting Inc. provides quality focused consulting in the areas of audit, provider compliance programs, practice evaluations, and clinical documentation compliance. To schedule an appointment, contact Rob Senska by calling 609-249-3819 or email RSenska@LW-Consult.com.

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.