



Weekly Auditing and Compliance Tip



National Alliance of Medical Auditing Specialists | 877-418-5564 | namas.co | namas@namas.co

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The Incredible Disappearing Consultation

In January of 2010, CMS ceased payment of CPT codes for consultations (99241 through 99245 for outpatient, and 99251 through 99255 for inpatient). This drastic step was preceded by several years of CMS and its administrative carriers (MACs) attempting to educate the provider community on documentation guidelines for consultations. Unfortunately, CERT audits, and the MAC probe audits those results spawned, showed that providers were still not meeting CMS standards.

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In the years since, commercial payers have slowly followed CMS' lead in halting payments for consultations. Beginning October 1, 2017, United Healthcare (UHC) will join this list. In announcing this change in its June 2017 Network Bulletin, UHC based their decision on "extensive data analysis" that "revealed misuse of consultation service codes" for its commercial members. From October 1st and forward, UHC states that it will reimburse "the appropriate evaluation and management (E/M) procedure code" which describes the place of service and the service rendered.

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As the reimbursement for consultation codes continues to disappear in the commercial world, providers are faced with a clear choice. Do they chalk it up to "the price of doing business" and abandon consultation codes altogether, or do they focus on being reimbursed for the services by the few commercial payers who are still willing to pay? If their choice is the latter, is it too late to change behavior to work on compliance with documentation standards? Finally, what exactly are those documentation standards?

This can be a lot to unwrap, but by looking at current, available information, the provider community can find an answer.

A good place to start is [UHC's current consultation policy](#). Despite the fact that it is scheduled for retirement a few months from now, everything in this policy is consistent with other payer policies, as well as wording in the 2017 CPT. In order to bill for a consultation, a provider must have:

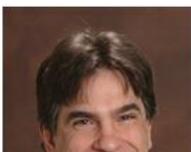
- Either a written or verbal request for a consultation from an "appropriate source" (which is classified as a physician or other health care provider);
- Documentation of this request in the patient's medical record;
- Documentation of the consultant's opinion in the patient's medical record; AND
- Communication via a written report back to the requesting physician/appropriate source.

These are, and have been, the rules for consultation codes. In surveying the specific policies of the payers still willing to reimburse for this category of CPT codes, the reader will more than likely not find a dramatic variance from these rules as stated.

In the habitually contentious arena of provider reimbursement, knowledge is power. Consultations may continue to disappear, but connecting the coding compliance dots put forward by the carriers that still pay for them may be the best hope for keeping remuneration flowing a little while longer.

This Week's Audit Tip Written By:

J. Paul Spencer, CPC, COC



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Paul is a Compliance Consultant with our parent organization, DoctorsManagement, LLC



And more!

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**Join NAMAS for the 9th Annual Auditing & Compliance Conference
December 2017 in Orlando, FL!**



NAMAS 9th Annual Auditing & Compliance Conference

December 2017 | Orlando, FL

Loews Sapphire Falls Resort

Conference Information

Pre-Conference: Tuesday, December 5

Conference: Wednesday, December 6 - Friday, December 8

Venue: Loews Sapphire Falls Resort
Orlando, FL

[Click Here to View the Conference Agenda](#)

Learn from the best in the industry, network with your peers and visit with our hand picked group of industry relevant exhibitors all in the gorgeous Caribbean inspired backdrop of the Loews Sapphire Falls Resort

Conference Pricing - Available Through September 30, 2017 Only

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Conference Only: \$1245

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NAMAS 9th Annual Auditing & Compliance Conference Speaker Spotlight



Speaker Spotlight



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- Registration to our EXCLUSIVE VIP Brunch & Session occurring the morning of Wednesday, December 6 before general session begins. This exclusive training will be presented by Frank Cohen
- Admission to our VIP ONLY EVENT - occurring the evening of Thursday, December 7. Enjoy a relaxing evening of entertainment, dancing, food and networking in the Caribbean inspired Sapphire Falls Resort
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J. PAUL SPENCER, CPC,
COC
Compliance Consultant,
DoctorsManagement

Auditing & Compliance, C. Frank
Spencer will be presenting the
following sessions:

- Defining a Successful Audit Policy & Plan
- Hands-On Auditing
- Hands-on Auditing Review & Application

Each week, we will spotlight a conference speaker and the session(s) he/she will be presenting. Join us for this year's conference December 6-8, 2017 in Orlando, FL at the Loews Sapphire Falls Resort! Click the image above to learn more about conference



NAMAS 2018 Conference Input Survey

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We invite you to take a brief survey to provide your feedback regarding locations for our annual conference

**Please click the image above to participate
Your feedback is greatly appreciated!**

NAMAS Calendar of Events

[Calendar](#)



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Click the image above to view our monthly calendar



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Hands On: Auditing Inpatient Services

Speaker: Deb Santos
August 22, 2017
2pm EST

This webinar is FREE for NAMAS Platinum members. This webinar is also available for purchase for \$49.99

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How to Effectively Monitor Your Risk Adjustment Reporting

Speaker: Betty Stump
August 29, 2017
2pm EST

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