

MP ECON 301:

**Coding and Billing
Principles and Nuts and
Bolts**

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Colorado Associates in Medical Physics

Disclosures

Chair, ASTRO Code Development and Valuation Committee

Member, ASTRO Code Utilization and Application Committee

Member: ASTRO Health Policy Committee

We'll discuss:

- Upcoming (July 2015) CMS Proposed Rule
- Work descriptions/times for Physics related CPT codes
- Bundling
- Presence/Supervision recommendations
- Documentation

We'll discuss:

- Billing Consultants
- Hospital Chargemaster Construction
- Episode of Care Payments
- Medical Physicist Assistants
- Sustainable Growth Rate Replacement (Doc Fix)

The image features a large, blue, 3D-style logo for 'BBBIS' superimposed over a photograph of a restaurant interior. The restaurant has a warm, dimly lit atmosphere with wooden tables and chairs. In the foreground, there are several tables with red tablecloths and some items on them, possibly menus or napkins. The background shows a bar area with shelves of bottles and a person standing behind the bar. The overall scene suggests a cozy dining environment.

BBBIS

Jazz, Blues, and Soups

Welcome To St. Louis



Welcome To St. Louis

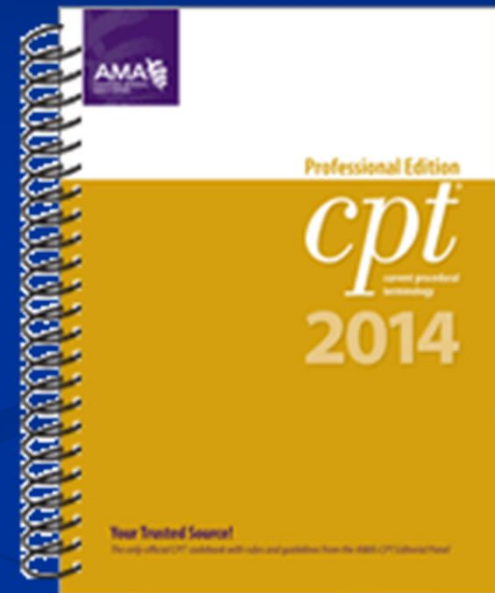


Welcome To St. Louis



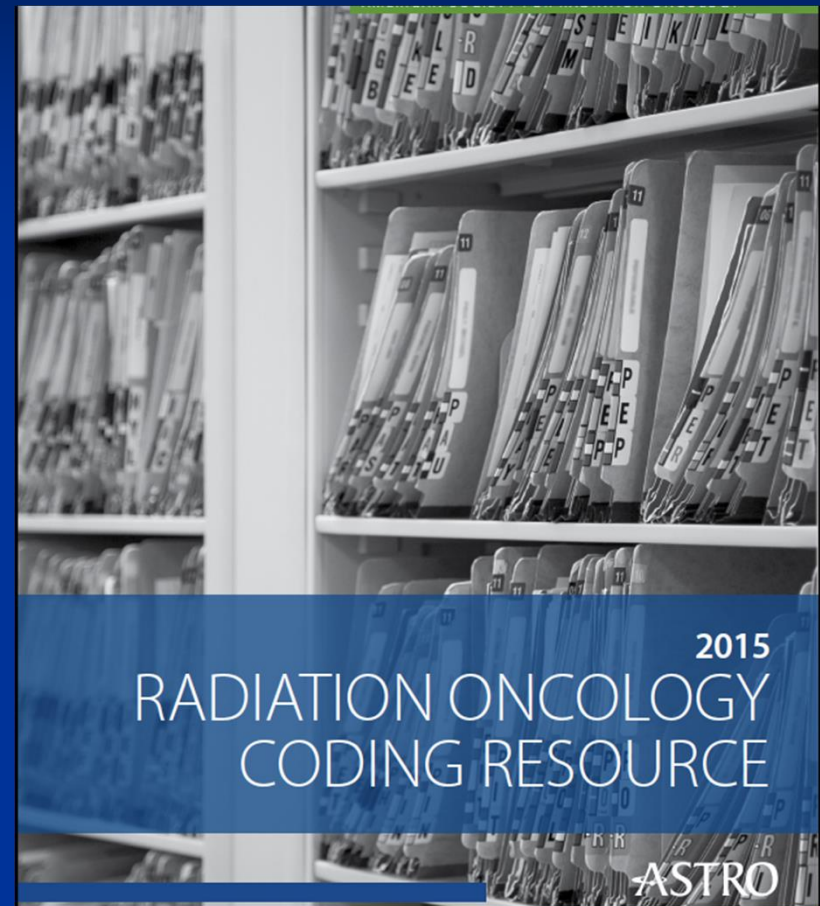
Service Descriptors

- Current Procedural Terminology (CPT®)
 - Listing of descriptive terms/identifying codes for reporting of medical services and procedures
 - Published by American Medical Association (AMA); copyrighted
 - Updated Yearly



Service Descriptors

- Radiation Oncology Coding Resource
- Published by ASTRO
- 2015 version is PDF
- Updated Yearly
- Contains code descriptors, coding guidance, documentation advice.



Coding Systems

- Health Care Common Procedure Coding System (HCPCS)
 - Level I: CPT Codes
 - Level II: Products, supplies, other services
 - Ex: brachytherapy sources (Cxxxx)
- International Stratified Classification of Diseases (ICD-9) (ICD-10)

Adoption Of ICD-10

Czech Republic	1994
England	1995
France	1996
Germany	1998
Australia	1999
Russia	1999
Canada	2000
China	2002
France	2005
Korea	2008
USA	2015

Interim Work RVUs for 2015

CPT Code	2014 RVU	AMA RUC Recommended RVU	2015 Interim RVU	CMS Refinement
77385 IMRT delivery; simple	New		I	n/a
77386 IMRT delivery; complex	New		I	n/a
77387 Guidance for tracking	New		I	n/a
77402 Radiation treatment delivery; simple	Revised		I	n/a
77407 Radiation treatment delivery; intermediate	Revised		I	n/a
77412 Radiation treatment delivery; complex	Revised		I	n/a

I=Not valid for Medicare purposes; established temporary HCPCS G-codes

2016 Changes

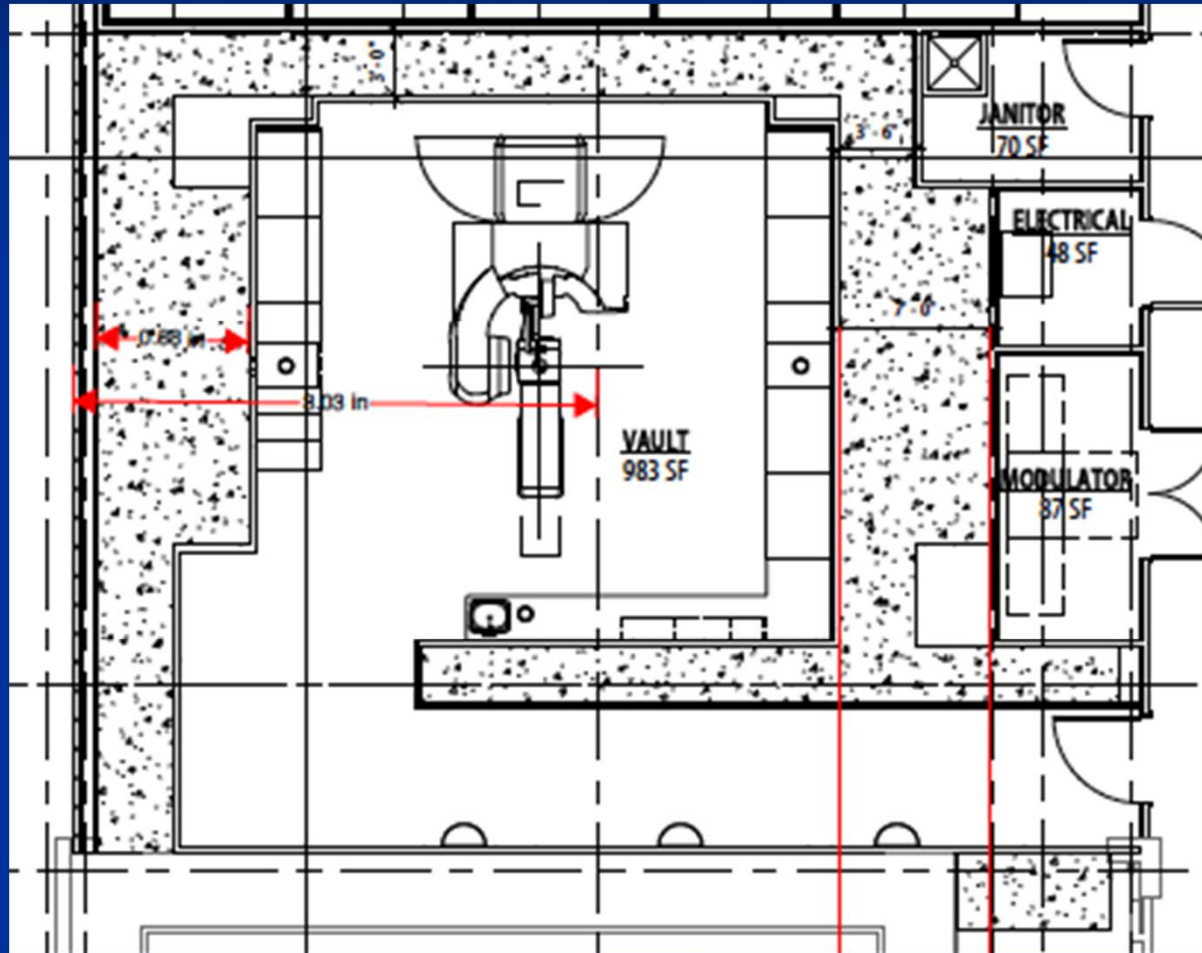
MFS 2015

CPT	Value
77418 IMRT	11.18 RVU
77421 KV IGRT	1.53 RVU
76950 US IGRT	1.44 RVU
0197T Tracking	CP
77014 CBCT	3.27 RVU

MFS 2016?

CPT	Value
77385 IMRT Simple	?
77386 IMRT Complex	?
77387 IGRT	?

Vault Cost???



Current valuation for IMRT Delivery

Staff	Intra Service	Post Service
RN/LPN/MA	3 min	
RTT	30 min	5 min
2 nd RTT	30 min	

Current valuation for KV IGRT

Staff	Intra Service	Post Service
RTT	24min	

Current valuation for IMRT +IGRT Delivery

Staff	Intra Service	Post Service
RN/LPN/MA	3 min	
RTT	30 min	5 min
2 nd RTT	30 min	
RTT	24 min	

Current valuation for IMRT Planning

Staff	Pre- Service	Intra Service	Post Service
RN/LPN/MA	2 min	6 min	2 min
RTT		48 min	5 min
Dosimetrist/Physicist		65 min	
Physicist		255 min	

Current valuation for IMRT Planning

- RN/LPN/MA: Greet and gown patient, obtain records, education & consent. Post procedure ±prescriptions, scheduling phone calls.
- RTT: Prepare simulation room, position and mark patient on CT, perform CT simulation, review and transfer data, clean room and equipment.

Current valuation for IMRT Planning

- Dosimetrist/Physicist:
 - Review imaging studies from outside of simulation
 - With physician create contours for GTV, CTV, PTV and OARs
 - Assess physician Rx for dose-volume objectives
 - Create initial table/gantry angles, objectives and constraints

Current valuation for IMRT Planning

- Dosimetrist/Physicist:
 - Run initial plan, review results and create iterative plans to achieve goals.
 - Summarize prescribed objectives vs. achieved objectives
 - Review preliminary plan with physician. Re-run optimization after consultation with physician.
 - Rank plans, review with physician for final plan choice.

Current valuation for IMRT Planning

- Dosimetrist/Physicist:
 - Create DRRs planar dose sets for plan verification transfer plan to R&V/Linac, communicate next steps to staff.
- Physicist: Plan verification

Current valuation for 77336 Continuing Medical Physics Consultation

Staff	Pre Service	Intra Service
Medical Physicist	6 min	30 min

Current valuation for 77336 Continuing Medical Physics Consultation

- Calibration Measurement and verification of imaging and delivery systems.
- Review and Analyze:
 - Delivered dose (target dose, cumulative dose)
 - Field shifts/imaging
 - Treatment / Rx changes, overrides
 - Resolve Setup and delivery problems
- Participate in patient setup as necessary
- Chart rounds, simulation planning conference
- Weekly patient chart review.

Current valuation for 77338 MLC device(s) for (IMRT), design and construction per IMRT plan.

Staff	Intra Service
Medical Dosimetrist	18 min
Medical Physicist/Medical Dosimetrist	90 min
Medical Physicist	10 min

Current valuation for 77338 MLC device(s) for (IMRT), design and construction per IMRT plan.

- Evaluate MLC pattern for anomalous leaf positions, each field
- Review fluence patterns, each field
- Review MU/segment for deliverability
- Reposition leaves and recalculate/reoptimize as necessary. Repeat MLC/fluence review.
- Transfer

Current valuation for 77293, Respiratory motion management simulation (add on)

Staff	Intra Service
RTT	17 min
Medical Physicist	23 min

Current valuation for 77293, Respiratory motion management simulation (add on)

- Position transducers, verify connectivity
- Coach patient, track, repeat until reproducible
- Set trigger (phase/amplitude)
- Set Cine/pitch parameters, set technique
- Acquire scan
- Reconstruct/set respiratory tags
- Create MIP, Avg, MinIp, ungated, etc.
- Assist physician with creation of ITV

MFS Implications in the HOPPS World

- Productivity Indices
- Site of Service Anomalies

Site of Service Anomalies

CPT	HOPPS	MFS
77290 Simulation Complex	\$314	\$430
77295 3D Plan	\$1038	\$267
77300 Dosimetry Calc	\$113	\$31
77301 IMRT Plan	\$1038	\$1528
77306 Isodose Simple	\$113	\$144
77307 Isodose Complex	\$113	\$282
77318 Brachy Complex	\$314	\$201

Site of Service Anomalies

CPT	HOPPS	MFS
77290 Simulation Complex	\$314	\$430
77295 3D Plan	\$1038	\$267
77300 Dosimetry Calc	\$113	\$31
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77307 IsodoseComplex	\$113	\$282
77318 Brachy Complex	\$314	\$201

Site of Service Anomalies

CPT	HOPPS	MFS
77334 Device Complex	\$216	\$88
77336 Weekly Physics	\$113	\$77
77338 MLC Design IMRT	\$314	\$506
77370 Special MP Consult	\$113	\$117
77414 Tx Delivery Complex	\$193	\$257
77418 IMRT Delivery	\$508	\$400
77787 HDR Tx Complex	\$729	\$529

Site of Service Anomalies

CPT	HOPPS	MFS
77334 Device Complex	\$216	\$88
77336 Weekly Physics	\$113	\$77
77338MLC DesignIMRT	\$314	\$506
77370 Special MP Consult	\$113	\$117
77414 Tx Delivery Complex	\$193	\$257
77418 IMRT Delivery	\$508	\$400
77787 HDR TxComplex	\$729	\$529

RAW Screens over the past year (2014)

- Issues identified in the NPRM including High Expenditure Allowed Charges > \$10 million
 - *(77263 & 77334)*
- New Technology/New Services
- Work neutrality Impacts
 - *(57155 & 57156)*

RAW Screens over the past year (2014)

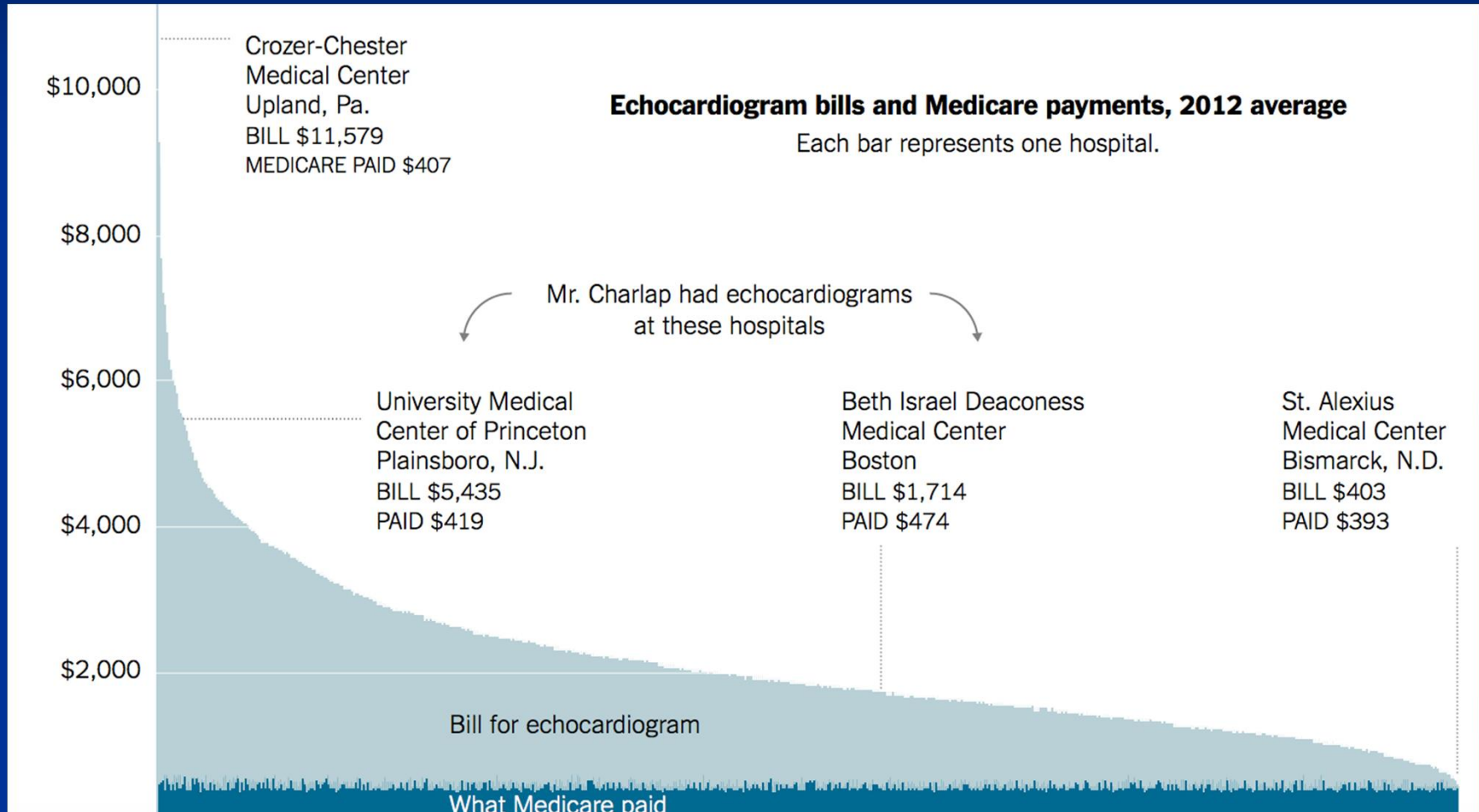
- Re-Run of Previous Screens (based on new data) including CMS/Other and Site-of Service Anomalies
- Moderate Sedation performed by Another Provider the Same Day Analysis
- Outstanding Referrals
 - *(77778, 77787, 77790 – CPT Editorial Panel)*

RAW Screens over the past year (2014)

- High Volume Growth Services where Medicare utilization increased by at least 100% from 2006 to 2011
- Billed Together (2013)
 - 77300



NYT 15 Dec 2014



Action Items

- Create and value new CPT codes in the Chargemaster
- Fold charges:
 - IGRT (77421, 77014,76950,0197T) into 77385,77386 in a weighted fashion
 - Dose Calculation(s) into 77306,77307,77316,77317,77318
- Arrange for 77372 and associated codes to arrive to Medicare on a separate claim.

Action Items

- Arrange for Breast Brachytherapy catheter placement and associated codes to arrive to Medicare on a separate claim.
 - 19296,19298 (Catheter placement)
 - 77424,77425 (IORT)
 - 19301,19302 ? (Lumpectomy)

Billing Consultants



Billing Consultants



Billing Consultants



The Prime Directive

- "No identification of self or mission. No interference with the social development of said planet. No references to space or the fact that there are other worlds or civilizations.+

United Federation of Planets

The Prime Directive(s)

- Medical Necessity
- Only bill for services you have actually performed



William Brody, M.D. Ph.D.
President

Johns Hopkins University

- Not so very long ago, hospitals dealt with only a small number of organizations that paid for medical care. There was Medicare and Medicaid, Blue Cross/Blue Shield and a handful of private insurers. Recently, I asked my chief financial officer how many payers we deal with today. The number shocked even me. He said Johns Hopkins Hospital has to bill more than 700 different payers and insurers.

77336 ?

