

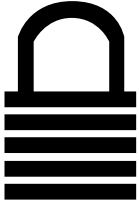
PROVIDER UPDATES

MAY 2019

INSURANCE. POLICY. REGULATIONS.



OIG WORK PLAN UPDATES



Monthly the Office of Inspector General (OIG) updates the OIG Work Plan, which outlines the “areas of most significant concern” for healthcare providers. While it is imperative to follow all “usual” state, federal, and other specific compliance guidelines, the OIG informs providers what “Active Risk Areas” they will be concentrating on. Here are some relevant active or recent additions to the OIG Work Plan that you should consider including in your current compliance plan, internal audits, or practice education if applicable:

1. Physicians Billing for Critical Care Evaluation and Management Services

While critical care is generally rendered in a critical care area such as a coronary, respiratory, ICU, or emergency department, it can be reimbursed in other locations as long as the care provided meets critical care requirements. The patient must be critically ill or critically injured, and care must be delivered directly. Since critical care is billed with time-based codes, it is essential to document the severity of the patient’s condition and the begin / end time for patient care. Do not “puff documentation” to support billing for critical care, or additional time to justify billing for an additional 30 minutes.

2. Medicare Part B Payments for End-Stage Renal Disease Dialysis Services

While Medicare Part B covers outpatient dialysis services for beneficiaries that are diagnosed with ESRD, the OIG now considers this an area of concern. Please ensure there is sufficient documentation to support medical necessity for these services, and are ordered by a physician treating the patient.

3. CMS Medicare Beneficiary Identifier Card

As a result of the Medicare Access and CHIP Reauthorization Act of 2015, CMS had to remove Social Security Numbers from Medicare cards and began replacing them with Medicare Beneficiary Identifiers (MBI). The OIG is monitoring the distribution and use of these cards, but it is your responsibility to request the MBI information from the patient and use only the new MBIs. MBIs will be the only accepted identifier for all transactions beginning January 1, 2020.

4. Medicare Part B Payments for Podiatry and Ancillary Services

Medicare generally does not cover (E&M) services when they are provided on the same day as another podiatry service (e.g., nail debridement performed as a covered service) unless it is billed with a significant separately identifiable service. Since the OIG has identified inappropriate payments previously for podiatry and ancillary services, the OIG will review payments to determine medical necessity and if they meet Medicare requirements.

5. Characteristics of Part D Beneficiaries at Serious Risk of Opioid Misuse or Overdose

The opioid crisis is now a public health emergency. Even though a large percentage of opioid-related overdose deaths occurred in Alabama, Kentucky, Ohio, Tennessee, and West Virginia, all of the United States is being critically examined for the distribution and use of opioids. The OIG is looking to identify patients who are at serious risk of opioid misuse or overdose to combat this national catastrophe.

For other active risk areas from the OIG, you can visit this link.

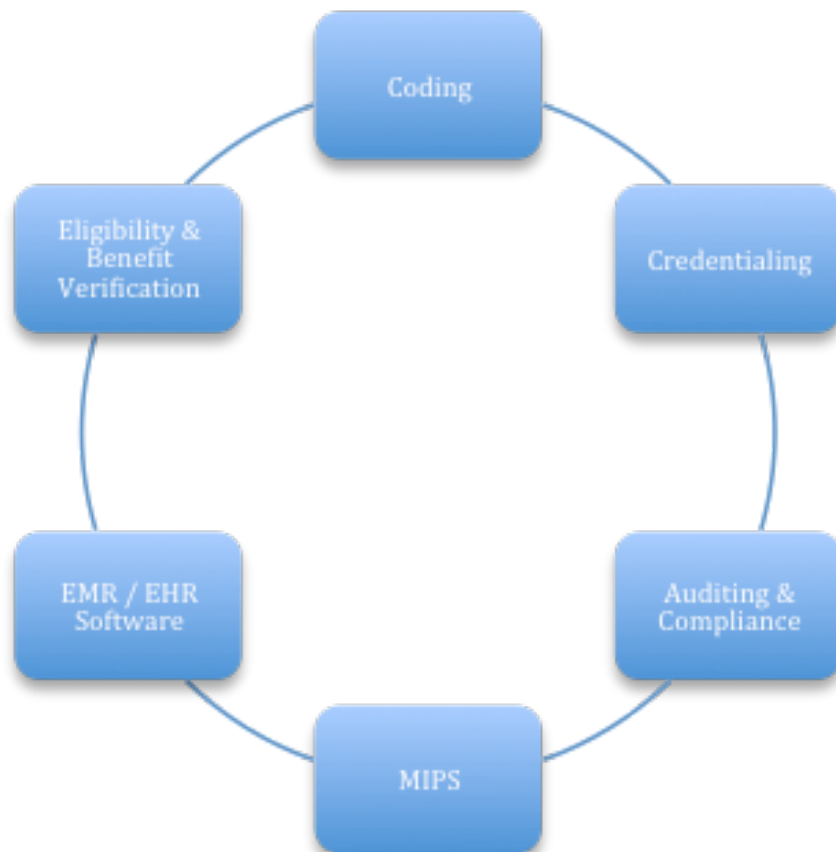
Does your practice have a compliance program in place? Developing a voluntary compliance program not only reduces your chances of an audit from CMS or OIG, it also will help your practice minimize billing mistakes, increase the speed of claim payment, and avoid conflicts with the self-referral and anti-kickback statutes. Our AAPC Certified Professional Compliance Officer (CPCO) can assess your current compliance program, develop a program, and monitor your practice's compliance.

MIPS

Congratulations! All of our clients that were required to report for MIPS in 2018 did so successfully. Do you have a program in place for 2019, or wonder if your practice is able to opt-in this year? If not, or if you have any questions regarding MIPS we have we are here to help.

IBC

Recently we attended the Independence Blue Cross Provider Engagement Forum. Here we presented our concerns about our clients' connectivity to their network coordinators and our ability to have their insurance process your claims correctly and in a timely fashion. All of our points were addressed by IBC and they will be working to service you better.



Have questions you would like answered? Please email taylor.w@mbidv.com