AVOID BEING AN OUTLIER: AUDIT YOUR E&M CODING

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a MERIDIAN MEDICAL MANAGEMENT company

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MAY 3, 2018 | VERTEXDR CLIENT FORUM



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Presentation Objectives

Identify the advantages of E&M Auditing

Describe E&M Audit and Sampling Process

Recognize how an EHR E&M Calculator Functions

Understand the E&M Level Evaluation Process

Describe How to Use Your Results and Avoid Pitfalls

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Why Conduct E&M Audits – Avoid the Trap

- Heavy scrutiny by CMS and OIG contractor
- Overpayment demands for E&M services
- OIG recommends additional educational documents
- Educational notifications are flagged as targets
- Effective down-coding errors

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Don't risk being an attractive target in an environment where healthcare spending is too high and CMS, DHHS and the OIG face significant pressures to reduce 'fraud, waste and abuse'.

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OIG Statement



E&M Audit Process

 \mathbf{B}



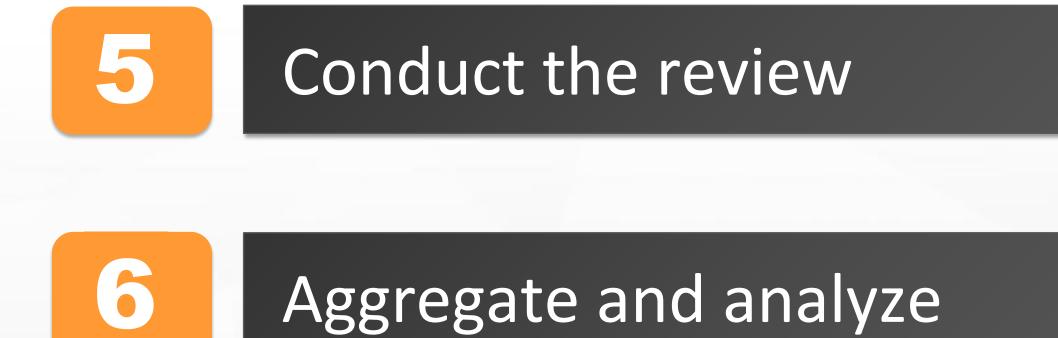






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3



Enhancing coding practice

Re-evaluate



Sampling Types

- Probability Samples
 - The probability of selecting any one element from the population is known and equal
- Non-probability samples
 - The probability of selecting any one element from the population is not known and are not equal

Sampling Goal – a true representation of the population under review



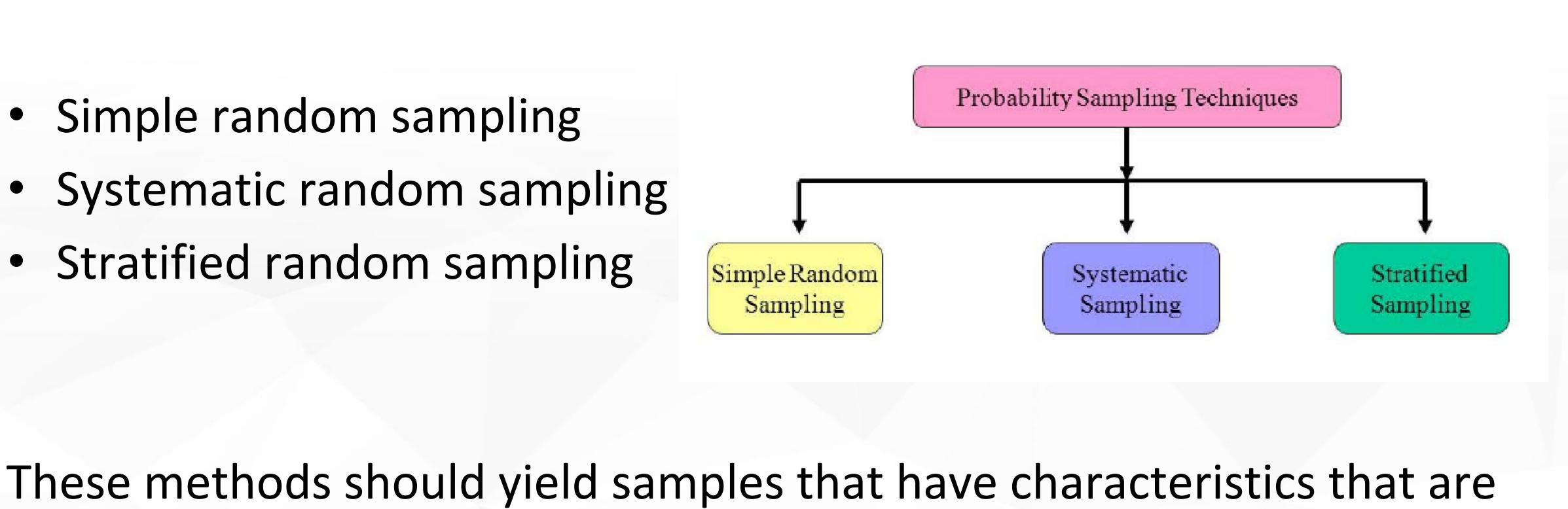




Types of Probability Sampling

- Simple random sampling
- Systematic random sampling
- Stratified random sampling

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very close to those of the population.

System E&M Calculator

Benefits

- No need to determine the E&M level
 - Captures the specialty and payer mix for the practice
 - 1995 vs 1997 E&M guidelines
- Accurate documentation = accurate E&M level
- VertexDr system is periodically audited to verify accuracy
- Caution: Avoid EHR cloning

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Conducting the Review

History

Exam

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Medical Decision Making

Time

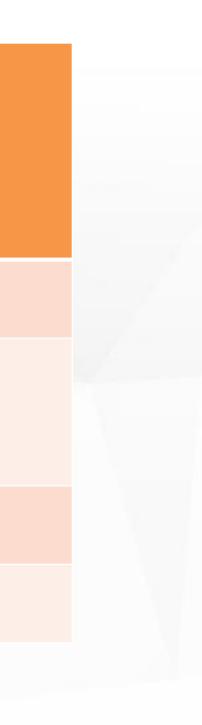
Documentation is Key



History Type	Chief Complaint	History of Present Illness	Review of Systems	Past, Family and/or Social History
Problem Focused	Required	Brief	N/A	N/A
Expanded Problem Focused	Required	Brief	Problem Pertinent	N/A
Detailed	Required	Extended	Extended	Pertinent
Comprehensive	Required	Extended	Complete	Complete

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History



AAPC Audit Tool - History

History of Present Illness	Revie
Location	Co
Quality	🗆 Ey
Severity	🗆 Ea
Duration	🗆 Ca
Timing	🗆 Re
Context	🗆 Ga
Modifying factors	Ge
Associated signs and symptoms	🗆 Int
□ No. of chronic diseases	D M
	🗆 Ne
	D Psy
	🗆 En

PF-Brief HPI EPF-Brief HPI, ROS (Pertinent-1) Detailed-Extended HPI (4+) + ROS-(2-9) PFSH-1 Comprehensive- Extended HPI + ROS (10 + systems) PFSH-2 Established, 3 New Patient PFSH Form reviewed, no change PFSH form reviewed, updated PFSH form new

**Extended HPI-Status of 3 chronic illnesses with 1997 DG. Some allow for 1995 as well.

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History

ew of Systems

- onstitutional symptoms
- /es
- ars, nose, mouth, throat
- ardiovascular
- espiratory
- astrointestinal
- enitourinary
- tegumentary
- usculoskeletal
- eurological
- sychiatric
- ndocrine
- Hematologic/lymphatic
- Allergic/immunologic

Past, Family & Social History

PAST MEDICAL

- Current medication
- Prior illnesses and injuries
- Operations and hospitalizations
- Age-appropriate immunizations
- □ Allergies □ Dietary status

FAMILY

- Health status or cause of death of parents, siblings, and children
- Hereditary or high risk diseases
- Diseases related to CC, HPI, ROS

SOCIAL

- Living arrangements
- □ Marital status □ Sexual history
- Occupational history
- Use of drugs, alcohol, or tobacco
- Extent of education
- □ Current employment □ Other

History





Type of Exam

Problem Focused

Expanded Problem Focused

Detailed

Comprehensive

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Exam Elements

Description

Limited examination of affected body area or organ system

Limited exam of affected body area or organ system

Extended exam of affected body area(s) or organ system(s)

General multi-system exam or complete exam of

a single organ system



AAPC Audit Tool – Exam Elements

	General Multi-Sy
Constitutional	
3 of 7 (BP, pulse, respir, tmp, hgt, wgt)	Gastrointestinal
General Appearance	Abd (+/- masses or to
Eyes	Liver, Spleen
Conjunctivae, Lids	□ Hernia (+/-)
Eyes: Pupils, Irises	Anus, Perineum, Rectu
Ophthal exam -Optic discs, Pos Seg	Stool for occult blood
ENT	GU/Female
Ears, Nose	Female: Genitalia, Vag
□ Oto exam -Aud canals, Tymp membr	Female Urethra
□ Hearing	Bladder
Nasal mucosa, Septum, Turbinates	Cervix
ENTM: Lips, Teeth, Gums	□ Uterus
Oropharynx -oral mucosa, palates	Adnexa/parametria
Neck	GU/Male
□ Neck	Scrotal Contents
Thyroid	Penis
Respiratory	Digital rectal of Prosta
Respiratory effort	Lymphatic
Percussion of chest	Lymph: Neck
Palpation of chest	Lymph: Axillae
Auscultation of lungs	Lymph: Groin
Cardiovascular	□ Lymph: Other
Palpation of heart	Musculoskeletal
Auscultation of heart (& sounds)	Gait (ability to exerc
Carotid arteries	Palpation Digits, Nails
Abdominal aorta	Head/Neck: Inspect, P
Femoral arteries	Head/Neck: Motion (
Pedal pulses	□ Head/Neck: Stability (
Extrem for periph edema/varicoscities	Head/Neck: Muscle st
Chest	Spine/Rib/Pelv: Inspec Spine/Rib/Pelv: Inspec Spine/Rib/Pelv: Matin
Inspect Breasts	Spine/Rib/Pelv: Motio Spine/Rib/Pelv: Motio
Delegation of Description & Amillion	□ Spine/Rib/Pelv: Stabil

Palpation of Breasts & Axillac

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ystem Examination

Gastrointestinal	R.Up Extrem: Motion (+/- pain, crepit)		
Abd (+/- masses or tenderness)	R.Up Extrem: Stability (+/- lux, sublux)		
Liver, Spleen	R.Up Extrem: Muscle strength & tone L Up Extrem: Inconst. Pala		
□ Hernia (+/-)	L.Up Extrem: Inspect, Palp		
Anus, Perineum, Rectum	L.Up Extrem: Motion (+/- pain, crepit)		
Stool for occult blood	L.Up Extrem: Stability (+/- lux, sublux)		
GU/Female	L.Up Extrem: Muscle strength & tone		
Female: Genitalia, Vagina	R.Low Extrem: Inspect, Palp		
Female Urethra	R.Low Extrem: Motion (+/-pain, crepit)		
Bladder	R.Low Extrem: Stability (+/- lux, laxity)		
Cervix	R.Low Extrem: Muscle strength & tone		
□ Uterus	L.Low Extrem: Inspect, Palp		
Adnexa/parametria	LLow Extrem: Motion (+/-pain, crepit)		
GU/Male	L.Low Extrem: Stability (+/- lux, sublux)		
Scrotal Contents	L.Low Extrem: Muscle strength & tone		
Penis	Skin		
Digital rectal of Prostate	Skin: Inspect Skin & Subcut tissues		
Lymphatic	Skin: Palpation Skin & Subcut tissues		
Lymph: Neck	Neuro		
Lymph: Axillae	Neuro: Cranial nerves (+/- deficits)		
Lymph: Groin	Neuro: DTRs (+/- pathological reflexes)		
Lymph: Other	Neuro: Sensations		
Musculoskeletal	Psychiatry		
Gait (ability to exercise)	Psych: Judgement, Insight		
Palpation Digits, Nails	Psych: Orientation time, place, person		
Head/Neck: Inspect, Palp	Psych: Recent, Remote memory		
Head/Neck: Motion (+/-pain,crepit)	Psych: Mood, Affect (depression, anxiety)		
□ Head/Neck: Stability (+/- lux, sublux)	E		
□ Head/Neck: Muscle strength & tone	Exam:		
Spine/Rib/Pelv: Inspect, Palp	1995-1-PF, limited 2-7-EPF, extended		
Spine/Rib/Pelv: Motion	2-7-Detailed, 8+ organ systems-Comprehensive		
Spine/Rib/Pelv: Stability	1997-1-5-PF, 6-11-EPF, 2x6 systems-D		
Spine/Rib/Pelv: Strength and tone			
C R.Up Extrem: Inspect, Palp	2 from 9 systems-Comp.		



Elements of Medical Decision Making (MDM)

Type of Decision Making	# of Diagnoses or Management Options	Amount and/or Complexity of Data	Risk of Complications, Morbidity and/or Mortality
Straight-forward	Minimal	Minimal or None	Minimal
Low Complexity	Limited	Limited	Low
Moderate Complexity	Multiple	Moderate	Moderate
High Complexity	Extensive	Extensive	High

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AAPC Audit Tool - MDM

Medical Decision Making

Number of Diagnoses or Treatment Options

Amount and/or Complexity of Data to be Reviewed

Risk of Complications, Morbidity,

Mortality

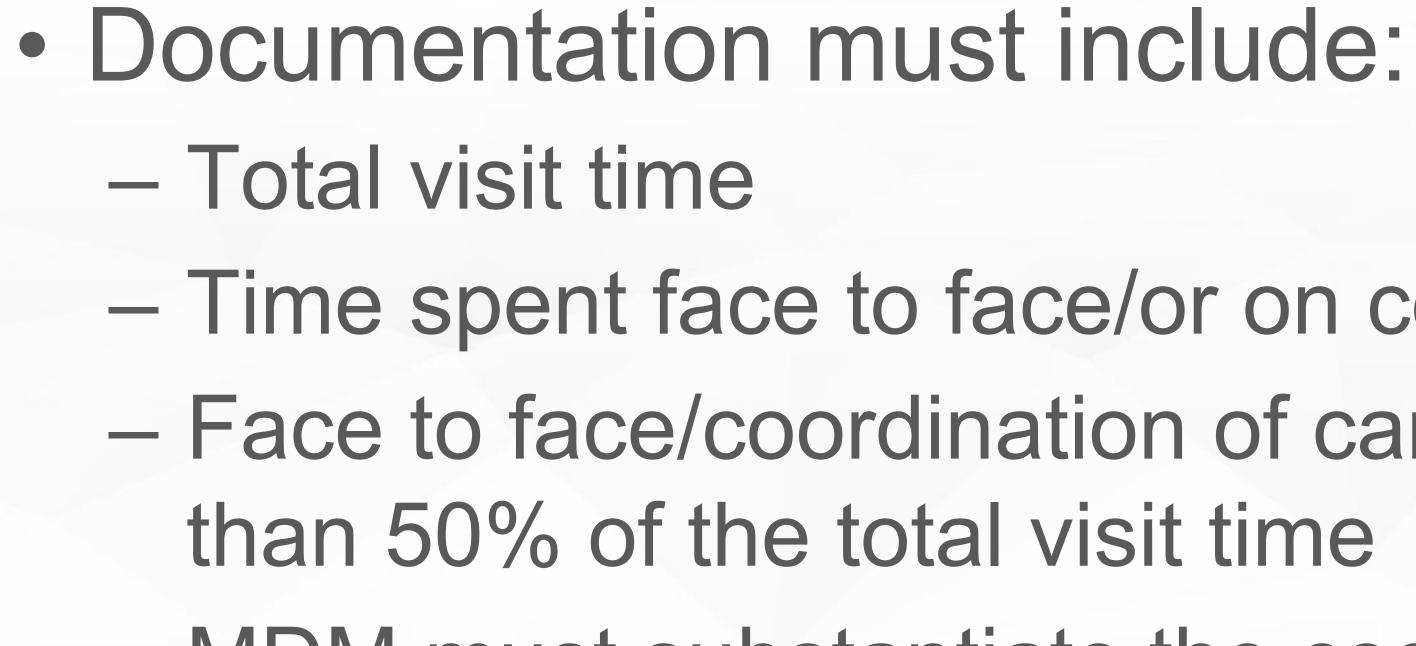
MDM Level=2 out of 3

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SF	LOW	MOD	HIGH
1	2	3	4
1	2	3	4
Minimal	Low	Moderate	High







MDM must substantiate the code being used

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Time

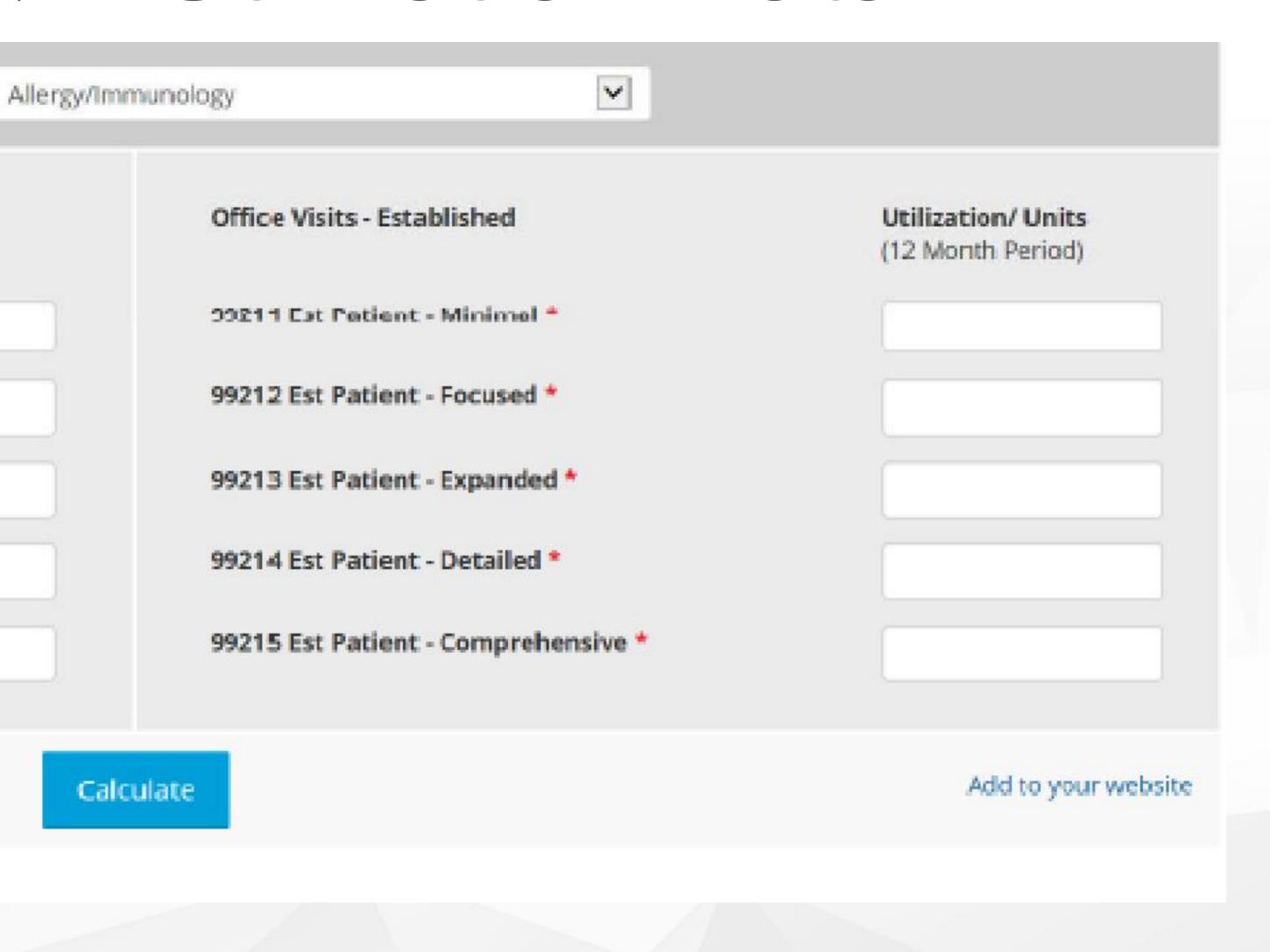
- Time spent face to face/or on coordination of care - Face to face/coordination of care time must be more



Analyzing E&M Utilization Data

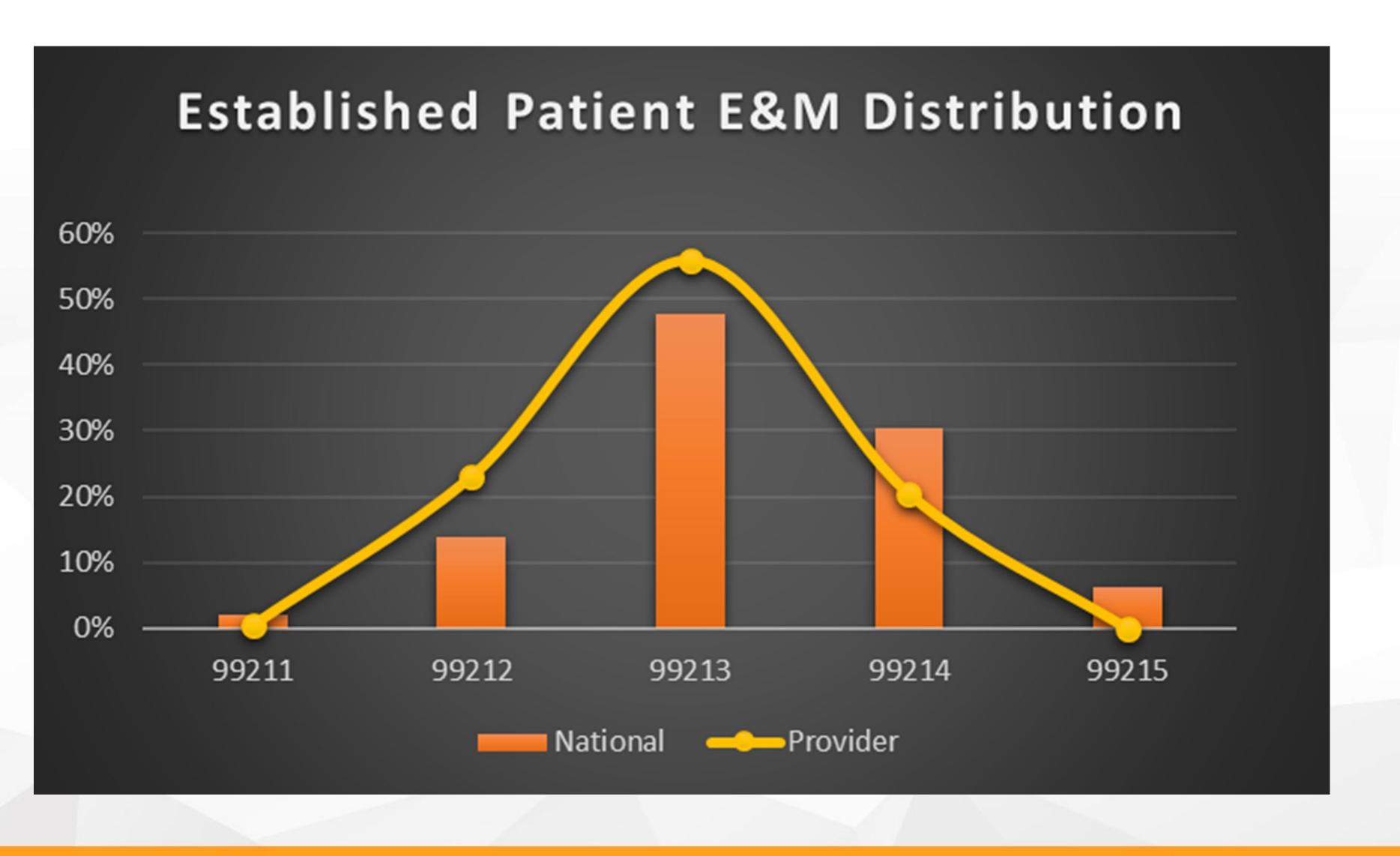
Select a specialty: New Patient Office Visits Utilization/Units (12 Month Period) 20201 New Patient - Focused * 99202 New Patient - Expanded * 99203 New Patient - Detailed * 99204 New Patient - Comprehensive * 99205 New Patient - Complex *

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Specialty – Family Medicine

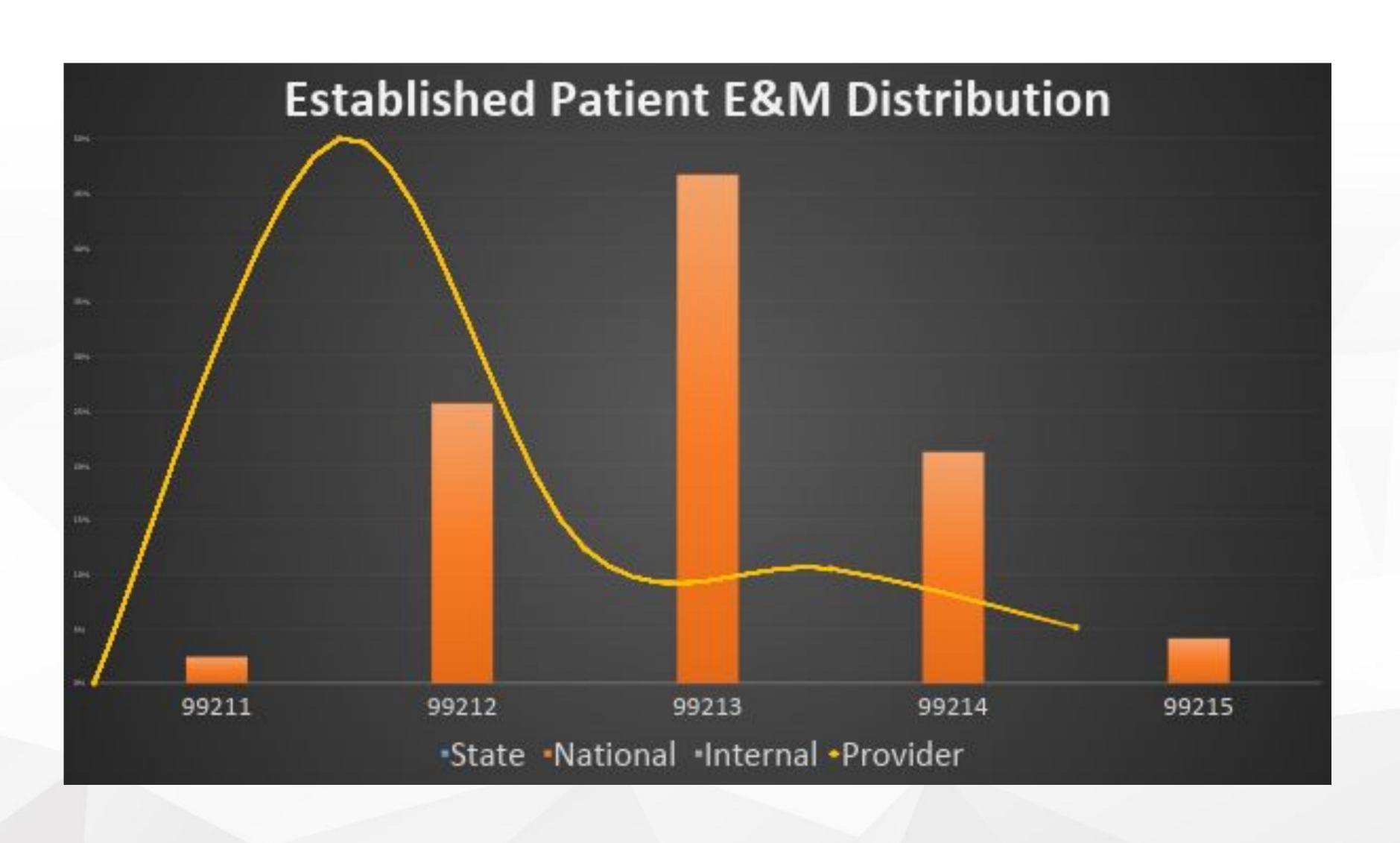
	Medicare	Provider
99211	2%	0.60%
99212	13.80%	23.10%
99213	47.60%	55.80%
99214	30.40%	20.40%
99215	6.30%	0%
	100.1%	99.90%



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Specialty – OB/GYN

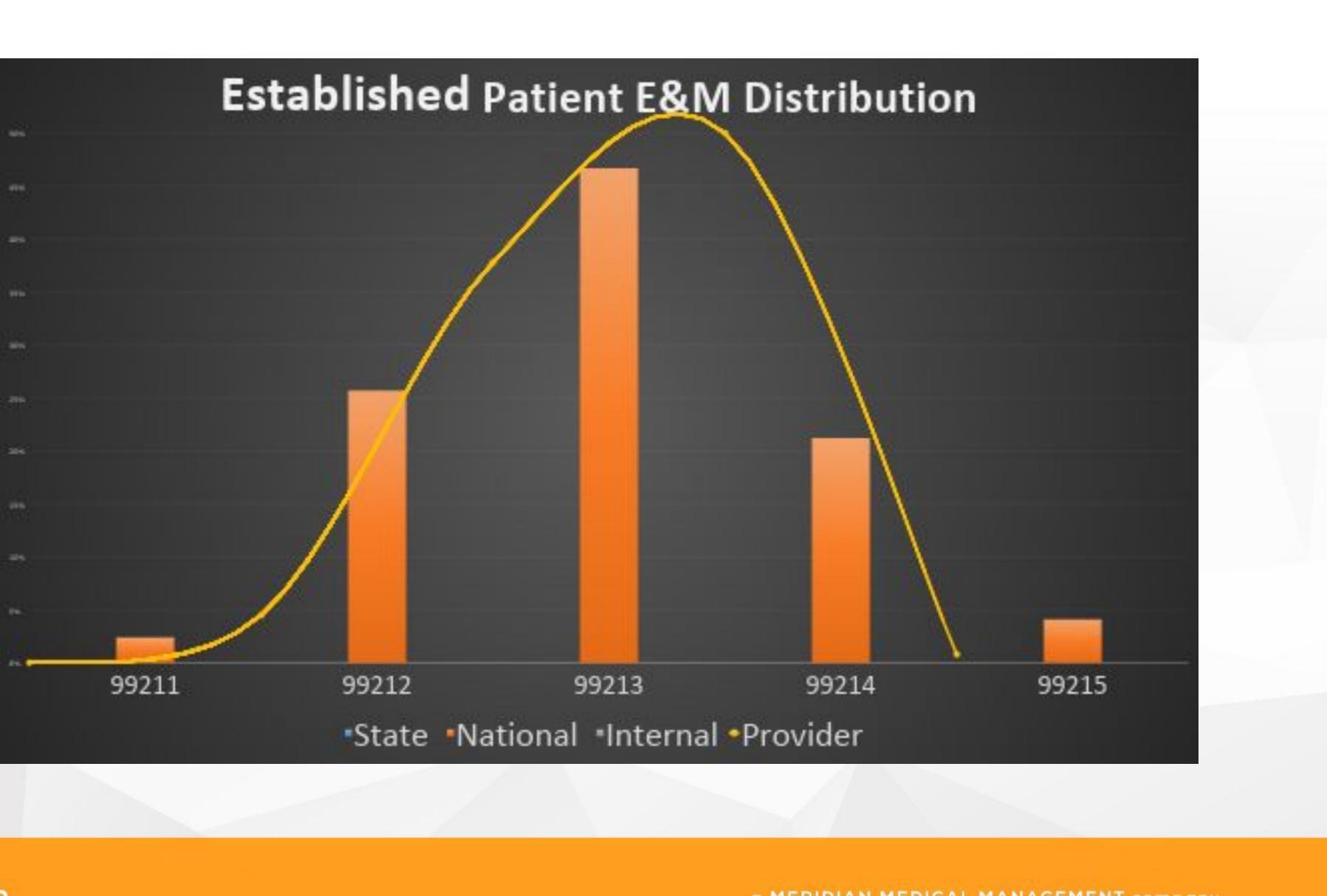
	Medicare	Provider
99211	2.40%	0%
99212	25.70%	72.10%
99213	46.70%	12.30%
99214	21.20%	10.50%
99215	4.10%	5.10%
	100.1%	100.00%



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Specialty – Orthopaedic Medicine

	Medicare	Provider
99211	2.40%	0%
99212	25.70%	4.50%
99213	46.70%	37.80%
99214	21.20%	56.80%
99215	4.10%	0.80%
	100.1%	99.90%



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Consider Variances

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Don't assume improper coding

Evaluate curve shifts for causes

Examine reports of potential overuse

Conduct a focus review of high level codes



Avoid These Pitfalls



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- EHR Cloning
- Failure to document the Chief Complaint
- Chronic condition vs status of condition
- Check boxes or templates
- Lack of or conflicting documentation
- 95 and 97 E&M Coding Guidelines confusion



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