

# Compliance Newsletter

#### November 2018

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#### **Compliance Hotline**

Type:

http://157.21.29.163/Compliance/

and click on Hotline.

EVMS Medical Group Compliance concerns may also be sent to the EVMS Medical Group Compliance Office via phone, mail or e-mail.

## Physician Fee Schedule 2019 Final Rule

The final rule for the 2019 CMS Physician Fee Schedule was published on November 1, 2018. In the proposed version a major change in payment structure for E/M services was noted. That change has been postponed until 2021 at this time. According to CMS, the following policies will be adopted beginning in 2019:

- "Elimination of the requirement to document the medical necessity of a home visit in lieu of an office visit;
- For established patient office/outpatient visits, when relevant information is already contained in the medical record, practitioners may choose to focus their documentation on what has changed since the last visit, or on pertinent items that have not changed, and need not rerecord the defined list of required elements if there is evidence that the practitioner reviewed the previous information and updated it as needed. Practitioners should still review prior data, update as necessary, and indicate in the medical record that they have done so;
- Additionally, we are clarifying that for E/M office/outpatient visits, for new and established patients for visits, practitioners need not re-enter in the medical record information on the patient's chief complaint and history that has already been entered by ancillary staff or the beneficiary. The practitioner may simply indicate in the medical record that he or she reviewed and verified this information; and
- Removal of potentially duplicative requirements for notations in medical records that may have previously been included in the medical records by residents or other members of the medical team for E/M visits furnished by teaching physicians."

Many groups including the AAMC have asked for clarification on these policies and CMS has responded noting that an FAQ is forthcoming (no date provided). CMS has also finalized plans to

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### **Contact Us**

### **EVMS Medical Group Compliance Office**

4111 Monarch Way, Suite 500 Norfolk, VA 23508 Phone 451-6200

#### Link to Policies & Forms: http://www.evms.edu/patient\_care/ compliance\_program/

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## Compliance "Listserv"

Send an email to browerl@evms.edu to request to be added to the EVMS Medical Group Compliance "Listserv". Once you are subscribed, you will receive newsletters, information and training opportunity announcements directly. include two new separately payable codes for virtual medicine to include:

- Brief communication technology-based service, e.g. virtual check-in (HCPCS code G2012) and
- Remote evaluation of recorded video and/or images submitted by an established patient (HCPCS code G2010)

Specific guidance on these changes and more will be provided as it becomes available from CMS. At this time there are more questions than answers on how some changes to E/M policies will be implemented. The complete text of the 2019 Physician Fee Schedule may be located at the link below:

2019 Physician Fee Schedule Final Rule

## Interpretation and Report

For CPT codes that require an interpretation and report, a computer generated report alone is not sufficient documentation without the added interpretation from the physician or provider. CMS requires a separate interpretation and report as well as a signature from the ordering provider for the service. It is not specified that the interpretation and report needs to be on a separate piece of paper and therefore many providers successfully include notes regarding their interpretation on the computer generated form itself, which is acceptable. It is also worth noting that the interpretation and report does have to be completed by the Teaching Physician if working with a resident. As always, medical necessity for the service should also be documented in the medical record.

## e-PHI Security Tip

Social media and the clinic do not mix. Cell phones should not be used in clinical areas to take photos or post to social media. Even photos of personal areas can inadvertently contain information regarding patients in the background. Any cell phone use of this nature should be reported as it could lead to a breach of PHI and because it violates the EVMS/EVMS Medical Group Social Media Policy.

# Lunch Discussion Session December

Topic: CPT Changes 2019

**Who Should Attend**: Those involved in the documentation, coding, billing or auditing process.

**Date and Location:** Thursday, December 20<sup>th</sup>, 12-1:00 pm in HH 758

Please RSVP to Laura Brower at browerl@evms.edu or 451-6202 and feel free to bring your lunch!