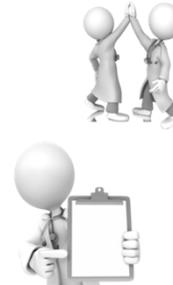


REVENUE CYCLE MANAGEMENT DURING AND AFTER COVID-19



REVENUE CYCLE . CHC EXPERTISE
PEACE OF MIND



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Agenda

- Introduction
- WFH Management
- Telehealth mastery
- Medicare G2025 (with & w/o CS)
- COVID testing
- Vaccinations
- What's next?
- Summary

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Work From Home (WFH) Challenges

Separation of work place & home... how?

- Distractions: Kids, home school, spouse, pets, laundry, etc.
- Quarantine
- Two working adults... sharing house with how many?

And the need to get work done:

- Organizational culture & connection
- Internet capabilities
- Accountability & work assignment
- Going TOTALLY paperless
- Training
- Onboarding "new"
- Back to the office & back to WFH & back...(how long?)

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Work From Home (WFH) Policy Thoughts

- Safeguard Confidential Info (PHI, HIPAA, RDP, etc.)
- Health & Safety of location (OSHA)
- Corporate Equipment (ONLY for work... no sharing)
- Office Supplies (what will you supply?)
- Electronic Resources
E.g., Internet... up to \$20/month
- Legal Compliance... not company responsibility
E.g., Tax deduction declaring home office
- "Regular" work hours
- Meetings ONLY at client or office
- Telecommuting... not = childcare
- Telecommuting not for everyone

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WFH: Tips to Safeguard Info

1. **Be mindful of where you are working.**
 - A. Prefer separate room... low risk of PHI breach (verbal or other)
 - B. Keep monitor viewing secure
2. **When discussing confidential information, keep it down!**
3. **Clear browser history/cache & close browser when done**
4. **Keep virus protection systems up to date**
 - A. Up to date anti-virus & anti-malware
 - B. Limit personal equipment use
 - C. Limit personal stuff on company equipment
5. **Sign out of all data systems when not in use**
 - A. No friends, family, etc. to use devices
6. **Do not save or copy confidential information**
 - A. No downloads to external HDs or flash drives or personal email
 - B. Company network only
7. **No business confidential data or PHI at home**

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WFH Technology (1 of 2)

Resolution Tracking Report

Report By: Check Month: 2011 to 2018

Please Note: The results of this query reflect activity up to midnight of 06/20/2019

[Print to PDF](#) | [Export to CSV](#)

User	Performance Tracking			Resolved				Pending												
	Actionable Claims	Resolution Rate	Pending Rate	Total Resolved Claims	Paid	Adjusted	Billed Patient	Deemed Non Actionable	Total Pending Claims	Denied	Re-Denied	Reversed	Escalated	Appealed	In Progress	Internal	Processing for Payment	Reprocessed	Secondary Claim	System
	2	0%	100%	0	0	0	0	0	2	2	0	0	0	0	0	0	0	0	0	0
	71	0%	100%	0	0	0	0	0	71	2	0	0	0	0	0	69	0	0	0	0
	3934	73%	27%	2889	2885	0	2	2	1045	942	16	4	0	0	0	0	0	0	0	83
PER	147	3%	97%	5	5	0	0	0	142	21	2	2	0	0	0	117	0	0	0	0
RTH	2067	74%	26%	1536	1131	0	0	234	531	7	134	0	8	0	0	96	0	262	2	2
	233	53%	47%	123	75	45	0	3	110	0	13	0	6	0	2	0	0	69	0	0
	366	47%	53%	173	88	35	44	6	193	130	14	0	0	4	0	8	0	37	0	0
	326	33%	67%	106	18	35	52	1	220	1	0	0	0	2	0	0	0	217	0	0
	82	71%	29%	58	16	20	6	16	24	2	8	0	4	0	0	0	0	10	0	0
	503	88%	11%	450	173	113	44	120	53	1	2	0	0	0	6	0	0	44	0	0
	421	36%	64%	153	54	56	41	2	268	2	12	2	2	92	0	0	1	140	14	3
	440	71%	29%	313	86	162	42	23	127	3	8	0	7	10	0	1	0	98	0	0
JM	46	46%	54%	21	8	2	0	11	25	1	4	0	0	1	0	0	0	19	0	0
...	154	62%	38%	95	65	5	26	7	59	6	10	0	5	0	2	0	0	36	0	0
Total	8792	67%	33%	5922	4594	588	315	425	2870	1120	223	8	32	109	10	291	1	972	16	88

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WFH Technology (2 of 2)



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POLL QUESTION:

Do you have a telecommuting or WFH Policy?

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1135 Waiver COVID PHE Changes to Telehealth...What lasts? (1 of 3)

- Providers may use non-HIPAA Compliant video chats
 - E.g., Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype
 - NOT Facebook Live, Twitch, TikTok, & similar public facing video communication apps
 - Despite UNsecure tech, enforcement discretion by OCR related to “good faith provision”
 - Notify patients of privacy risks
- Need policy for waiving fees (SFDS) in PHE... not CS modifier
 - Understand limits of HRSA compliance plan
 - Special PHE relief (e.g., hurricane, tornado, flood, pandemic, etc.)
 - Understand “nominal fee reduction” vs. waiving obligatory fees
 - Get legal counsel around program modification

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1135 Waiver COVID PHE Changes to Telehealth... What lasts? (2 of 3)

- Provider considerations
 - Volunteers & FTCA: GAP vs. local “state of emergency” coverage?
 - Provider employment agreement language
 - Afford written guidelines re. POS latitude (e.g., hospital or ED)
 - Include permission to act in the event of an emergency
 - Primary Care Exception: General Supervision Requirements during COVID PHE
- Geographic restrictions lifted
 - No HPSA or originating site required
 - Providers/patients may be home
 - Temporary sites are good for 30 days, NOT permanent after PHE
- Visit frequency limits lifted
- Expanded list of telehealth services
- AUDIO only vs. audio and visual requirement
- E&M Time & MDM (new 2021 E&M documentation guidelines)

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1135 Waiver COVID PHE Changes to Telehealth... What lasts? (3 of 3)

- 99211 payable!!! (DOS 1-March and forward)...
 - Not PPS but Telehealth approved per MLN Matters SE20016
 - INCIDENT TO “Consequently, we are revising the definition of direct supervision to allow, for the duration of the PHE for the COVID-19 pandemic, direct supervision to be provided using real-time interactive audio & video technology.”
 - Page 57: <https://www.cms.gov/files/document/covid-final-ifc.pdf>

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Update from CMS

#1 Claim Example for DOS 27-Jan through 30-Jun:

Revenue Code	HCPCS Code	Modifier
052X	G0467 (or other appropriate FQHC Specific Payment Code)	N/A
052X	99214 (or other FQHC PPS Qualifying Payment Code)	95
052X	G2025	95

#2 Claim Example DOS 1-Jul and forward:

Revenue Code	HCPCS Code	Modifier
052X	G2025	95

Format #2 for ANY telehealth after 1-July

Format #2 for any audio only telehealth as of 1-Mar DOS

****Per CMS, health centers should engage each MAC re. claim submission requirements.****

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Update from CMS... > 1 Service on single DOS

#1 Claim Example for DOS 27-Jan through 30-Jun:

Revenue Code	HCPCS Code	Modifier
052X	G0467 (or other appropriate FQHC Specific Payment Code)	N/A
052X	99214 (or other FQHC PPS Qualifying Payment Code)	95
052X	G2025	95
900	G0470	N/A
900	90832	95
900	G2025	95

#2 Claim Example DOS 1-Jul and forward:

Revenue Code	HCPCS Code	Modifier
052X	G2025	95
900	G2025	95

Format #2 for ANY telehealth after 1-July

Format #2 for any audio only telehealth as of 1-Mar DOS

****Per CMS, health centers should engage each MAC re. claim submission requirements.****

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CS & 95 Modifiers

- CS: Waived Cost-Sharing
 - Medicare preventive
 - Some telehealth but not all
 - Resource: <http://www.gopmg.com/wp-content/uploads/2020/09/HCPCS-CS-Modifier-Guidelines-for-Health-Centers-v4.pdf>
- 95: Telehealth
 - Optional with G2025 & Commercial payers
 - Managed Medicare & Medicaid FFS
 - Policies will vary

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POLL QUESTION:

Since July 1 does your MAC require your health center to submit G2025 with a 95 Modifier?

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COVID Testing Types

- Detects either Current Infection status or Antibodies
- Viral (Active): Detects SARS-CoV-2 nucleic acid or antigen
 - Respiratory samples; i.e., nasal or oral swabs or saliva
- Antibody (Past): detects antibodies via serologic assays
 - Blood samples

Resources:

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html>

<https://www.cms.gov/files/document/mm11937.pdf>

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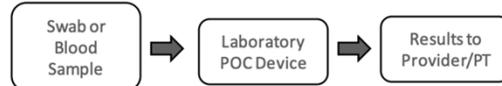
18

COVID Testing Flow Chart

Laboratory Based Test



Point of Care Test



Source: <http://www.gopmg.com/wp-content/uploads/2020/10/COVID-Testing-updated-10-05-20.pdf>

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COVID Testing Flow Chart

Molecular and Antigen Diagnostic POC Test at the Health Center

LOCATION	IN OFFICE	E/M TELEHEALTH	Virtual Check-in or E-Visit	TELEPHONE
Assessment	New or Established E/M Visit code	New or Established E/M Visit code	99421-99423 G2010/G2012 (PPS G0071)	99441-99443 (G2025)
Swab Collection at the health center	Included	Included	Included	Included
POC Testing At Health Center	87635 or 87426	87635 or 87426	87635 or 87426	87635 or 87426

Note: 87635 is used for the nucleic acid POC antigen test and 87426 is used for the immunoassay POC antigen test

Molecular and Antigen Testing Not Performed at the Health Center

LOCATION	IN OFFICE	E/M TELEHEALTH	Virtual Check-in or E-Visit	TELEPHONE
Assessment	New or Established E/M Visit code	New or Established E/M Visit code	99421-99423 G2010/G2012 (PPS G0071)	99441-99443 (G2025)
Swab Collection at the health center	Included	99211*	99211*	99211*
Specimen Conveyance from health center to laboratory	99000*	99000**	99000**	99000**

* May be able to bill if visit is on a separate day from the Telehealth visit. Source: <https://codingintel.com/specimen-collection-for-covid-19/>

** Check with Payer. CPT 99000 is not covered by Medicare

Source: <http://www.gopmg.com/wp-content/uploads/2020/09/COVID-Testing-updated-8-27-20.pdf>

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COVID Testing Flow Chart

Serology Antibody POC Test at the Health Center

LOCATION	IN OFFICE	E/M TELEHEALTH	Virtual Check-in or E-Visit	TELEPHONE
Assessment	New or Established E/M Visit code	New or Established E/M Visit code	99421-99423 G2010/G2012 (PPS G0071)	99441-99443 (G2025)
Blood Collection at the health center	Included	Included		Included
POC Testing At Health Center	86328 or 86769*	86328 or 86769*	86328 or 86769*	86328 or 86769*

* CPT 86328 is used for a single-step reagent test as would be typical with POC testing whereas CPT 86769 is used for a multi-step reagent test processed on more sophisticated laboratory instruments.

Source: <http://www.gopmg.com/wp-content/uploads/2020/10/COVID-Testing-updated-10-05-20.pdf>

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COVID Testing Flow Chart

Serology Antibody Testing Not Performed at the Health Center

LOCATION	IN OFFICE	E/M TELEHEALTH	Virtual Check-in or E-Visit	TELEPHONE
Assessment	New or Established E/M Visit code	New or Established E/M Visit code	99421-99423 G2010/G2012 (PPS G0071)	99441-99443 (G2025)
Blood Collection at the health center	Included	99211*	99211*	99211*
Specimen Conveyance from health center to laboratory	99000**	99000**	99000**	99000**

* May be able to bill if visit is on a separate day from the Telehealth visit. Source: <https://codingintel.com/specimen-collection-for-covid-19/> ** Check with payer. CPT 99000 is not covered by Medicare

NOTE: 99072: During PHE, Additional supplies, materials, and clinical staff time over and above those usually included in an office visit or other non-facility service(s)

Source: <http://www.gopmg.com/wp-content/uploads/2020/10/COVID-Testing-updated-10-05-20.pdf>

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COVID ICD, QW Modifier, & \$

- U07.1: COVID confirmed by lab test (emergency issued 1-Apr)
 - Excludes 1 (not coded together):
 - B34.2: Coronavirus infection, unspecified;
 - B97.2-: Coronavirus as the cause of diseases classified elsewhere
 - J12.81: Pneumonia due to SARS-associated coronavirus
- Z20.828: Exposure to other viral communicable disease
- Z03.818: Possible exposure
- Z11.59: Screening
- Signs & Sx: R05 = Cough, R06.02 = SOB, R50.9 Fever, unspec.
- Pneumonia from COVID: 1st U07.1 & then 2nd J12.89
- COVID in Pregnancy: 1st O98.51X & then 2nd COVID ICD
- QW required in CLIA Waived setting (Ask MAC/payers)
- Learn local payer & governmental lab allowances
 - <https://www.cms.gov/files/document/mac-covid-19-test-pricing.pdf>

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POLL QUESTION:

Is your health center billing 99211 for “drive through” or parking lot COVID testing?

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Vaccinations

- Follow current vaccination protocols
- Administration
 - 90460 & +90461 (0-18 years)
 - 90471 & +90472 (18+ years)
 - 90473 & +90474 (Intranasal or oral)
- New HCPCS for substance
- ICD: Z23... probably with special COVID ICD
- Cost report vs. FFS... Unknown
- Payer detail used for DOH COVID tracing

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What's Next

- Permanency of telehealth... eased restrictions?
- Expected patient backlog (volume increase?)
- Medicaid population growth (jobless increase)
- Audits of providers & billing companies
 - G2025, no qualifying visit required
- Coding for recurring infections
- Telehealth as standard care offering
- Modified Blended Encounter Rate
 - Combo G2025 & full PPS

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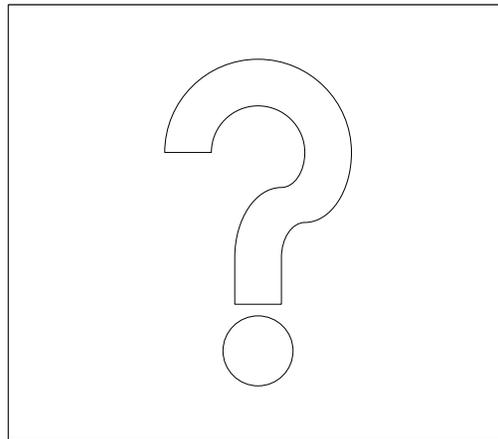
Summary

- WFH may be new reality in perpetuity
 - Need clear expectations & transparent feedback
- Telehealth is here to stay... as may be COVID
- Work with PM/EMR to standardize (e.g., G2025)
- New Blended Encounter Rate
- Commit to Educate (Top down)
- Update Constantly

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Questions????



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