

Payment Integrity Policy: Leveling of Emergency Room Services

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Reference Number: CC.PP.053

Product Types: ALL

Effective Date: 7/1/2019

Last Review Date: 8/17/2018

Coding Implications

See Important Reminder at the end of this policy for important regulatory and legal information.

Policy Overview

To address an identified trend in upcoding by emergency room providers, the health plan has adopted a program integrity strategy that will provide appropriate levels of reimbursement for services indicating lower levels of complexity or severity rendered in the emergency room.

Application

Hospitals, free-standing emergency centers, physicians or other qualified health professionals.

Reimbursement

The Centers for Medicare and Medicaid Services (CMS) affords states the flexibility to independently develop reimbursement methodologies for the use of emergency department services for lower levels of complexity or severity.

When a hospital, free-standing emergency center or physician bills a Level 4 (99284) or Level 5 (99285) emergency room service, with a diagnosis indicating a lower level of complexity or severity, the health plan will reimburse the provider at a Level 3 (99283) reimbursement rate.

Utilization

A coding algorithm was developed with the advice of a panel of emergency department and primary care physicians and based on an examination of a sample of almost 6,000 full emergency department records. Data from these records was used to classify each case into one of four categories. These classifications were then mapped to the discharge diagnosis of each case to determine for each diagnosis the percentage of sample cases that fell into these four categories. The health plan's claims processing system incorporates a list of diagnoses developed by medical directors and compared to the algorithm to adjudicate emergency department claims. The claims processing system looks for diagnoses that involve a lower level of complexity or intensity of services (i.e. that are never or rarely associated with Levels 4 or 5 severity).

If the diagnosis code classification falls into a categorization indicating a lower level of complexity or severity, services billed at a Level 4 or Level 5 severity code, will be reimbursed at the Level 3 emergency department reimbursement level. A provider may appeal if the provider disagrees with how the claim was adjudicated.

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Documentation Requirements

The patient's primary discharge diagnosis should be billed in the first diagnosis position on the emergency room claim form.

Coding and Modifier Information

This policy references Current Procedural Terminology (CPT®). CPT® is a registered trademark of the American Medical Association. All CPT® codes and descriptions are copyrighted 2016, American Medical Association. All rights reserved. CPT codes and CPT descriptions are from current 2016 manuals and those included herein are not intended to be all-inclusive and are included for informational purposes only. Codes referenced in this policy are for informational purposes only. Inclusion or exclusion of any codes does not guarantee coverage. Providers should reference the most up-to-date sources of professional coding guidance prior to the submission of claims for reimbursement of covered services.

Emergency Department Services – New or Established Patient

CPT/HCPCS Code	Descriptor
99281	Emergency department visit for the evaluation and management of a patient, which requires these 3 key components: - A problem focused history; - A problem focused examination; and – Straightforward medical decision making. Counseling and/or coordination of care with other physicians, other qualified health care professionals, or agencies are provided consistent with the nature of the problem(s) and the patient's and/or family's needs. Usually, the presenting problem(s) are self-limited or minor.
99282	Emergency department visit for the evaluation and management of a patient, which requires these 3 key components: - An expanded problem focused history; - An expanded problem focused examination; and – Medical decision making of low complexity. Counseling and/or coordination of care with other physicians, other qualified health care professionals, or agencies are provided consistent with the nature of the problem(s) and the patient's and/or family's needs. Usually, the presenting problem(s) are of low to moderate severity.
99283	Emergency department visit for the evaluation and management of a patient, which requires these 3 key components: - An expanded problem focused history; - An expanded problem focused examination; and – Medical decision making of moderate complexity. Counseling and/or coordination of care with other physicians, other qualified health care professionals, or agencies are provided consistent with the nature of the problem(s) and the patient's and/or family's needs. Usually, the presenting problem(s) are of moderate severity.
99284	Emergency department visit for the evaluation and management of a patient, which requires these 3 key components: - A detailed history; - A detailed examination; and – Medical decision making of moderate complexity. Counseling and/or coordination of care with other physicians, other qualified health care professionals, or agencies are provided consistent with the nature of the problem(s) and the patient's and/or family's needs. Usually, the presenting problem(s) are of high severity, and require urgent evaluation by the physician, or other qualified health care professionals but do not pose an immediate significant threat to life or physiologic function.

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99285	Emergency department visit for the evaluation and management of a patient, which requires these 3 key components within the constraints imposed by the urgency of the patient’s clinical condition and/or mental status: - A comprehensive history; - A comprehensive examination; and – Medical decision making of high complexity. Counseling and/or coordination of care with other physicians, other qualified health care professionals, or agencies are provided consistent with the nature of the problem(s) and the patient’s and/or family’s needs. Usually, the presenting problem(s) are of high severity and pose an immediate significant threat to life or physiologic function.
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References

1. *Current Procedural Terminology (CPT®)*, 2016
2. *Centers for Medicare and Medicaid Services, CMS Manual System and other CMS publications and services.*

Revision History	
08/10/2017	Initial Policy Draft Created
08/28/2017	Removed “non-emergent” language and replaced with “lower level of complexity or severity.” Removed redundant PLP language in second paragraph.
09/19/2017	Removed “team of physicians and nurses” language
05/17/2018	Removed first paragraph
8/15/18	Re-worded for clarity

Important Reminder

For the purposes of this policy, “Health Plan” means a health plan that has adopted this policy and that is operated or administered, in whole or in part, by Centene Management Company, LLC, or any other of such health plan’s affiliates, as applicable.

The purpose of this policy is to provide a guide for program integrity/payment for emergency room services. It does not constitute a contract or guarantee regarding payment or results. Coverage and payment determinations and the administration of benefits are subject to all terms, conditions, exclusions and limitations of the coverage documents (e.g., evidence of coverage, certificate of coverage, policy, contract of insurance, etc.), as well as to state and federal requirements and applicable plan-level administrative policies and procedures.

This policy is effective as of the date determined by Health Plan. The date of posting may not be the effective date of this policy. This policy may be subject to applicable legal and regulatory requirements relating to provider notification. If there is a discrepancy between the effective date of this policy and any applicable legal or regulatory requirement, the requirements of law and regulation shall govern. Health Plan retains the right to change, amend or withdraw this policy, and additional policies may be developed and adopted as needed, at any time.

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This policy does not constitute medical advice, medical treatment or medical care. It is not intended to dictate to providers how to practice medicine. Providers are expected to exercise professional medical judgment in providing the most appropriate care, and are solely responsible for the medical advice and treatment of members. This policy is not intended to recommend treatment for members. Members should consult with their treating physician in connection with diagnosis and treatment decisions.

Providers referred to in this policy are independent contractors who exercise independent judgment and over whom Health Plan has no control or right of control. Providers are not agents or employees of Health Plan.

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Note: For Medicaid members, when state Medicaid coverage provisions conflict with the coverage provisions in this policy, state Medicaid coverage provisions take precedence. Please refer to the state Medicaid manual for any coverage provisions pertaining to this policy.

Note: For Medicare members, to ensure consistency with the Medicare National Coverage Determinations (NCD) and Local Coverage Determinations (LCD), all applicable NCDs and LCDs should be reviewed prior to applying the criteria set forth in this policy. Refer to the CMS website at <http://www.cms.gov> for additional information.

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