

*The minutes below are a summary of the Advisory group meeting topics, group discussion, actions, and outcomes as a result of this meeting.*

## Meeting Details

**Date:** June 11, 2018

**Facilitator:** Patsy Schwenk, CGS J15 Provider Outreach and Education (POE)

**Attendees:**

- Angela Amey – Trident Health
- Elayne Biddlestone – AMCNO
- Debra Farley - BillPro
- Jennifer Hayhurst - OSMA
- Nancy Horn – Medical Compliance Services
- Phillip Horn – Medical Compliance Services
- Jennifer Kelley – OSUPhysicians
- Lora Kittles – Zotec Partners
- Lindy Lady – KMA
- Jean Pryor - St. Elizabeth Physicians
- Kelly Rupard – University of Kentucky Healthcare
- Candy Le'oso
- Darrell Spear - Kentucky Chiropractic Society
- Cindy Mack Alexander - CompuNet Clinical Lab
- Connie Brown - Reid Physician Associates
- Kimberly Dziekan - Wright State Physicians
- Melody Hall - Renal Physicians, Inc.
- Jennifer Jones - DayStar Billing Services, LLC
- Marsha Martin - Mount Carmel Medical Group
- Kelly Martinelli – Aultman Healthcare Compliance
- Jimelle Rumberg – Ohio Foot and Ankle Medical Association
- Michele Skinner – OAMTA
- Kelly Stahl – Clean Claim
- Stephanie Woods - GLMA
- Marsha Mount – Carmel Medical Group

**CGS Staff:**

- Leah Lewis - POE
- Juan Lumpkin – POE
- Vanessa Williams – POE
- Thaya Morant – Medical Review
- Karen Hughes – Provider Enrollment
- Shuanya Lovitt – EDI

## Agenda Items

### Opening Remarks

Patsy welcomed everyone and reminded all in attendance of the POE AG purpose.

### CGS Departmental Updates

#### Medical Review – Thaya Morant

Thaya shared an update on reviews associated with the Targeted Probe and Educate (TPE) (<https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/Medical-Review/Targeted-Probe-and-EducateTPE.html>) initiative. She discussed reviews involving E/M codes for emergency room, nursing home and office visits and ambulance services.

Current findings (<https://www.cgsmedicare.com/partb/pubs/news/2018/05/cope7602.html>) on these services include:

- **ER** – A lack of medical documentation to support the face to face visit, split shared services, and the level of service billed
- **Nursing Home** – Documentation does not support the medical necessity for the visit
- **Office** – Continue to see the misuse of the 25 modifier
- **Ambulance Claims** – Findings indicate that the PCS and ambulance crew medical necessity documentation is not matching

Thaya indicated that a total of 50 providers of different specialties have been moved on to round 2 of the TPE process. Thaya requested that the current TPE providers reach out to MR for education on the services being reviewed via the Part B TPE email box at

[J15BprobeandEducation@cgsadmin.com](mailto:J15BprobeandEducation@cgsadmin.com). The MR nurse reviewers will continue to educate after the round of reviews are completed. New MR tools have been created and can be found at <https://www.cgsmedicare.com/partb/mr/tools.html>.

POE AG members and Thaya discussed the current ambulance services TPE denials. All agreed the ambulance crews need to accurately document how the patient presents at the time of the transport.

#### Provider Enrollment – Karen Hughes

Karen reviewed the enrollment revalidation process. All can access CMS revalidation database website at: <https://data.cms.gov/revalidation>. It will be updated on July 1, 2018. Karen reminded attendees that provider groups can retrieve revalidation due dates for all group members from this website. Directions can be found at the bottom of the page under the Access Data section.

#### EDI – Shuanya Lovitt

Shuanya reminded the group that the annual PPTN recertification for Part B providers will begin on September 1, 2018. This is pertinent to just a few Part B providers and information can be found at: <https://www.cgsmedicare.com/partb/pubs/news/2018/06/cope8093.html>. The myCGS helpdesk is handled by the EDI department and they can be reached at 1.866.276.9558 option 2.

#### CERT Update – Patsy Schwenk

Patsy shared the current CERT top error information received from Julene Lienard, the CGS CERT Coordinator. Top Errors:

##### 1. Signature

###### ▪ MISSING:

1. Attestation for initial inpatient progress note, echo and TEE or electronic signature policy

###### ▪ RECEIVED:

1. Initial inpatient progress note and procedures for billed DOS, which are not authenticated; the note states: “to be electronically signed in Meditech” and “until signed this is an unconfirmed preliminary report”. After tech stop received copies of these services with a signature added to each, dated 12/19/2017.

**REMINDERS:** If your EMR system prints a note that states “to be electronically signed in Meditech” you MUST include your electronic signature policy for this to be accepted as a valid electronic signature. Do NOT add a late signature to any documentation, Medicare guidelines state adding a late signature is considered altering the medical record; instead use the attestation process when a signature is missing or illegible.

- The following link is to our Signature webpage which offers more information on the signature guidelines and an attestation you may use: <https://www.cgsmedicare.com/partb/mr/signatures.html>

##### 2. Drug Testing

- **MISSING:** Sufficient documentation in the clinical record to support the medical necessity of the Presumptive Drug Test

###### ▪ RECEIVED:

1. Order;
2. Lab results;
3. Visit note dated 10/11/17 which documented follow-up of LB discomfort and intent for UDS. The note made no mention of risk assessment, noncompliance or illicit drug use or aberrant behavior.

NOTE: See MLN Matters Number: SE18001 ‘Proper Coding for Specimen Validity Testing Billed in Combination with Drug Testing’: <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/SE18001.pdf>

### 3. Prolonged Services

- **MISSING:** Documentation of the start and end times on the physician's visit note
- **RECEIVED:**
  1. Authenticated visit note which did not include the start and end time;
  2. Brief transcribed progress note which states "We discussed treatment options at length" and had a handwritten time documentation of "2 HR";
  3. Documentation of referral from;
  4. Documents pertaining to breast cancer diagnosis (results of mammography, breast ultrasound, pathology reports).
- **RECEIVED AFTER TECH STOP:**
  1. Duplicate copy of progress notes

**NOTE:** See MLN Matters Number MM5972: 'Prolonged Services (Codes 99354-99359) for detailed information regarding time: <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/mm5972.pdf>

### 4. Lab Services

- **MISSING:**
  1. Physician order or documentation supporting intent for labs,
  2. Clinical documentation supporting medical necessity for billed labs.
- **RECEIVED:**
  1. Progress note, which is signed illegibly and the plan is also illegible.
  2. Requisition where labs billed on these lines are not marked on the requisition,
  3. Results collected on billed DOS.

**NOTE:** See 'CGS Lab Services/Orders Fact Sheet': [https://www.cgsmedicare.com/partb/mr/pdf/lab\\_services\\_orders.pdf](https://www.cgsmedicare.com/partb/mr/pdf/lab_services_orders.pdf)

CERT questions can be addressed to Julene at [julene.lienard@cgsadmin.com](mailto:julene.lienard@cgsadmin.com) or 1.615.782.4591

A member asked for documentation clarification on non face to face prolonged services and she was directed to send her question to the [cmd.inquiry@cgsadmin.com](mailto:cmd.inquiry@cgsadmin.com) email box.

## New Business

### Recent POE AG Survey Results – Leah Lewis

Leah thanked everyone for completing the recent surveys on educational topics and the CGS website and shared survey results.

- **Road Show Topics Survey**
  - Top topics included: MSP, Incident-To/Split Shared and Modifiers. We will be building our upcoming Road Show agenda and education based on the results.
- **ForeSee Website Survey**
  - The POE AG members were asked to take the CGS website ForeSee satisfaction survey. This survey is available to anyone who visits the <https://www.cgsmedicare.com> website. Leah followed the POE AG member activity and although the participation rate was low, the results indicated the POE AG member website satisfaction rate is 83%. This is higher than the average provider satisfaction rate of 69%. Several member comments were received regarding broken links, additional FAQ suggestions and myCGS portal issues. Leah shared that every user comment received on the ForeSee survey is reviewed internally. The group discussed their ideal websites (i.e. Google, AAPC, and Kohl's) as well as their CGS website expectations. Members agreed that they expect to find resources, specific answers and guidance on the website. When looking for these items, some use the search function but several use the navigational departmental tools. A member suggested increased social media for Part B including blogs or additional twitter

posts to include Medicare newsletter, E&M resources, or maybe a weekly update on the TPE findings with links to resources.

#### myCGS and Website Enhancement – Juan Lumpkin

- **myCGS Enhancements**

- Juan shared the Medical Review dashboard coming soon to myCGS. It will allow providers to find all MR requests for additional documentation in one location. Also additional letters are now available in the green mail option, including the overpayment initial demand letter.

- **Website Enhancements**

- Juan reminded the group of the POE focus on improving our website. The website self service tools were reviewed.

#### Inquiry Process – Patsy Schwenk

Patsy discussed the process for inquiries received from all providers including the members of the POE AG. CMS requires all inquiries to be tracked and reported. Therefore, inquiries regarding documentation and coverage determinations should be directed to [cmd.inquiry@cgsadmin.com](mailto:cmd.inquiry@cgsadmin.com). General inquiries can be submitted on line at [https://www.cgsmedicare.com/partb/cs/online\\_help.html](https://www.cgsmedicare.com/partb/cs/online_help.html) or via myCGS. Inquiries regarding educational events can be sent to [J15\\_PartB\\_Education@cgsadmin.com](mailto:J15_PartB_Education@cgsadmin.com).

#### June Meeting Assignment Discussion – Patsy Schwenk

Members were given a pre-meeting assignment to review the current PRISM educational handout and come prepared to give suggestions for the next quarter's handout. One member suggested we include information on Locum Tenens and Reciprocal Billing for the upcoming summer months. There were no suggestions for PCC training topics.

#### Old Business

##### New Medicare Card Project Update – Patsy Schwenk

New cards are currently being mailed. Kentucky and Ohio are in the last mailing wave. We are educating on all aspects of the initiative in every educational event we provide. CMS has great information at: <https://www.cms.gov/Medicare/New-Medicare-Card/index.html>.

##### Partner Collaboration Sign Up – Vanessa Williams

Vanessa reviewed the results of the collaboration polls completed during the March 2018 meetings. Those members who agreed to help us reduce the top unprocessable claim denials will be receiving articles and information to share with their members and practices. In Ohio, we will be focusing on claims that are being rejected for message D75 - Service is missing NPI for referring/ordering provider and B16 - Service is missing functional reporting G-codes for physical therapy services. In Kentucky, we will be focusing on claims that are being rejected for message B16 - Service is missing functional reporting G-codes for physical therapy services and 376 – information we requested was not received.

##### Upcoming Educational Events – Patsy Schwenk

Patsy reviewed the current Part B calendar of events. As a reminder, in-person events, Ask-the-Contractor Teleconference (ACTs), and webinars will be scheduled throughout the year. Always refer to the Calendar of Events to see what we are offering on our website at [http://www.cgsmedicare.com/medicare\\_dynamic/wrkshp/pr/partb\\_report.asp](http://www.cgsmedicare.com/medicare_dynamic/wrkshp/pr/partb_report.asp).

- As always, education is available upon request. Email requests to [J15\\_PartB\\_Education@cgsadmin.com](mailto:J15_PartB_Education@cgsadmin.com).

## POE Advisory Group Meeting Schedule

We have combined the independent state meetings to one combined meeting.

- Upcoming J15 Part B Meetings
  - September 12, 2018
  - December 11, 2018

### Roundtable/Questions

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A member asked if CGS will be providing any additional clarification on the use of medical student documentation by a teaching physician. She suggests CMS or CGS provide some examples to clear up the ambiguity associated with the guidelines. It was suggested that the member send her questions to the [cmd.inquiry@cgsadmin.com](mailto:cmd.inquiry@cgsadmin.com) email box. This topic will be discussed by Dr. Berman at the upcoming Kentucky Road Shows.

### Adjourn

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Meeting was adjourned.