

Report on Medicare Compliance Volume 28, Number 35. October 07, 2019 Tips for Coding Critical Care Services in Medicare

The error rate is high for critical care services, according to findings from the 2018 Comprehensive Error Rate Testing contractor. [1] Here are a couple pointers to help improve Medicare compliance, says Betsy Nicoletti, a consultant in Northampton, Massachusetts. Contact her at betsy@betsynicoletti.com.

CMS Rules Related to Critical Care That Are Not CPT Rules

CMS	CPT
The first hour (74 minutes) must be provided by one physician, before a second physician may use the add-on code 99292	CPT is silent on this
Physicians and nonphysician practitioners may not share critical care time	CPT is silent on this
Two physicians may not bill for the same instance of time (8-9 am, for example)	CPT is silent on this
One physician may not bill both ED codes 99281-99285 and critical care for the same patient on the same day	CPT is silent on this

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