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A Brief Primer on Compliant Billing for Inpatients With COVID-19

By Nina Youngstrom

Here are some important storylines for hospitals to follow to ensure compliance with Medicare rules on billing for inpatients diagnosed with COVID-19, according to Deloitte.^[1] There's a 20% add-on payment during the public health emergency if hospitals have documentation of a positive coronavirus test in the patient's medical record. Contact Kelly Sauders, a partner in Deloitte, at ksauders@deloitte.com.

20% add-on payment for COVID-19 inpatient MS-DRGs

CMS changed the documentation requirements effective with inpatient admissions as of September 1, 2020.

MLN Matters Number: MM11764, July 2020 Quarterly Update to the IPPS FY 2020 Pricer

Release date: 4/24/2020. Effective date: 7/27/2020.

- Provides temporary payment policy to increase the weighting factor for MS-DRGs by 20% for patients with a COVID-19 diagnosis on an inpatient claim during the COVID-19 PHE period.
 - Discharges from January 27 to March 31, 2020, with a diagnosis of B97.29 (other coronavirus as the cause of disease classified elsewhere) OR
 - Discharges on or after April 1, 2020, with a diagnosis of U07.1 (COVID-19)

MLN Matters Number: SE20015 Revised New Waivers for IPPS, LTCHs and IRFs due to Provisions of the CARES ACT

Release date: 8/17/2020. Updated: 9/11/2020.

- Inpatient claims eligible for the 20% add-on for COVID-19 will require documentation of **POSITIVE COVID-19 test documented** within the medical record **effective with admissions** occurring on or after 9/1/2020.
 - Test has to be a viral (e.g., molecular or antigen) performed during the hospital admission or within 14 days prior to admission.
 - If a positive test result is not documented within the medical record and a claim has a diagnosis code for COVID-19, **billing note NTE02 "No Pos Test"** should be entered on the electronic claim 8371 or a **remark "No Pos Test"** on a paper claim.

Note: Does not change the Official Coding Guidelines for patients being worked up or treated for COVID-19

Source:

July 2020 IPPS update: <https://www.cms.gov/files/document/mm11764.pdf>;
<https://www.cms.gov/files/document/r10058CP.pdf>.

September 11, 2020, Revised MLN: <https://www.cms.gov/files/document/se20015.pdf>

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