



BCA REV

Billing, Coding, Auditing, Revenue Cycle Training by BCA

A photograph of two healthcare professionals, an older man and a younger woman, in a clinical setting. The man, with white hair and wearing a red scrub top, is wearing blue gloves and pointing at a document. The woman, with curly brown hair and wearing a blue scrub top, is also looking at the document. They are both wearing stethoscopes. The background shows a clinical environment with blue drapes and medical equipment. A blue and green graphic element is on the left side of the image.

Tough Topics in FQHC

Foot and Wound Care

Effective April 2022

Agenda



Incident-To Basics



Foot Care Guidelines



Documentation Essentials



Reporting Wound Care



Documentation Troubles



Reporting Additional Concerns

Incident-To Basics

1

Service must meet all incident-to criteria

2

Initial visit rendered by ordering practitioner

3

Within the scope of practice for service provider

4

Part of normal course of treatment

5

Physician involved – direct supervision

6

Payer must accept – check with top payers

7

Billed under supervising physician/OQHP

Part B Medicare 99211 Definition



Services billed to Medicare under CPT 99211 must be reasonable and necessary for the diagnosis and treatment of an illness or injury.



The evaluation is substantiated when the record includes documentation of a clinically relevant and necessary exchange of information.



The encounter must include elements of both evaluation and management.



The management portion is substantiated when the documentation demonstrates an influence on patient care.

The FQHC/RHC Medicare rule: 99211 is not a ‘visit.’

Payments from the Medicare program for FQHCs/RHCs are per the PPS or AIR methodology.



A “visit” is defined as a face-to-face encounter between a patient and a physician, NP, PA, CNM, CP, CSW, or visiting nurse (very limited cases in the home) during which an RHC or FQHC service is rendered.

A ‘Nurse Visit’ may and should be coded and counted in the FQHC is not be billed as an “encounter” to Medicare.

- Check with your state Medicaid for FQHC/RHC guidance.



Noridian Guidance

Code	Description
11719	TRIMMING OF NONDYSTROPHIC NAILS, ANY NUMBER
11720	DEBRIDEMENT OF NAIL(S) BY ANY METHOD(S); 1 TO 5
11721	DEBRIDEMENT OF NAIL(S) BY ANY METHOD(S); 6 OR MORE
G0127	TRIMMING OF DYSTROPHIC NAILS, ANY NUMBER



Class Findings

Group 1 Paragraph:

For purposes of applying presumption of coverage, when the evidence available discloses certain physical and/or clinical findings consistent with the diagnosis and indicative of severe peripheral involvement, the following findings are pertinent:

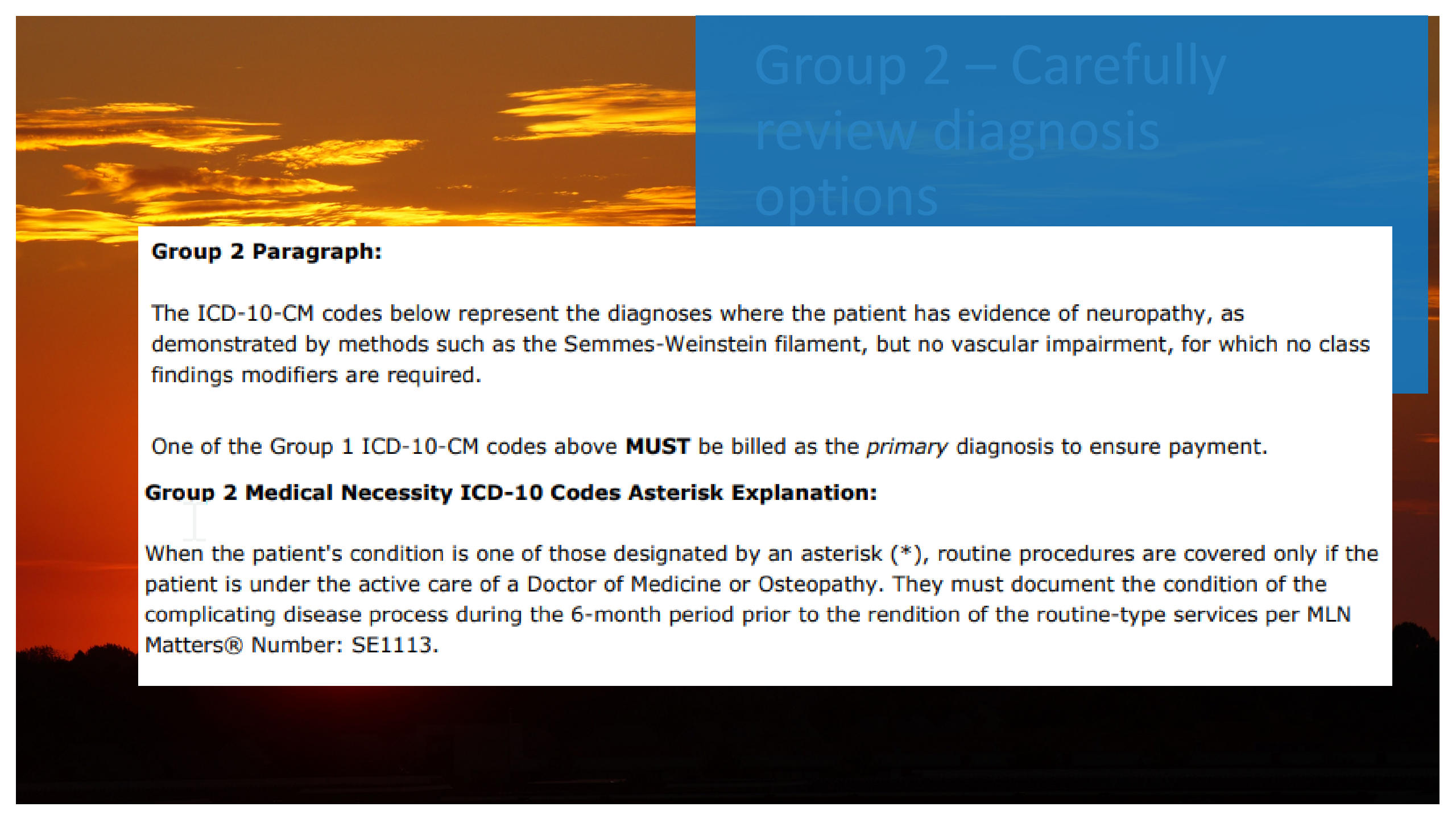
- Class A Findings:
 - Nontraumatic amputation of foot or integral skeletal portion thereof.
- Class B Findings:
 - Absent posterior tibial pulse;
 - Advanced trophic changes as: hair growth (decrease or absence) nail changes (thickening) pigmentary changes (discoloration) skin texture (thin, shiny) skin color (rubor or redness) (three required); and
 - Absent dorsalis pedis pulse.
- Class C Findings:
 - Claudication;
 - Temperature changes (e.g., cold feet);
 - Edema;
 - Paresthesias (abnormal spontaneous sensations in the feet); and
 - Burning.



Group 1 Modifiers

Group 1 Codes:

CODE	DESCRIPTION
Q7	ONE CLASS A FINDING
Q8	TWO CLASS B FINDINGS
Q9	ONE CLASS B AND TWO CLASS C FINDINGS



Group 2 – Carefully review diagnosis options

Group 2 Paragraph:

The ICD-10-CM codes below represent the diagnoses where the patient has evidence of neuropathy, as demonstrated by methods such as the Semmes-Weinstein filament, but no vascular impairment, for which no class findings modifiers are required.

One of the Group 1 ICD-10-CM codes above **MUST** be billed as the *primary* diagnosis to ensure payment.

Group 2 Medical Necessity ICD-10 Codes Asterisk Explanation:

When the patient's condition is one of those designated by an asterisk (*), routine procedures are covered only if the patient is under the active care of a Doctor of Medicine or Osteopathy. They must document the condition of the complicating disease process during the 6-month period prior to the rendition of the routine-type services per MLN Matters® Number: SE1113.

Group 3 – Refer to Class Modifiers

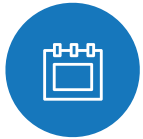
List of diagnosis where the pt has evidence of vascular impairment

Class modifiers are required

If pt's qualifying condition is marked by an asterisk, routine procedures are covered only if the pt is under active care of a Doctor of Medicine or Osteopathy (MD or DO).

See MLN Matters SE1113

Group 4



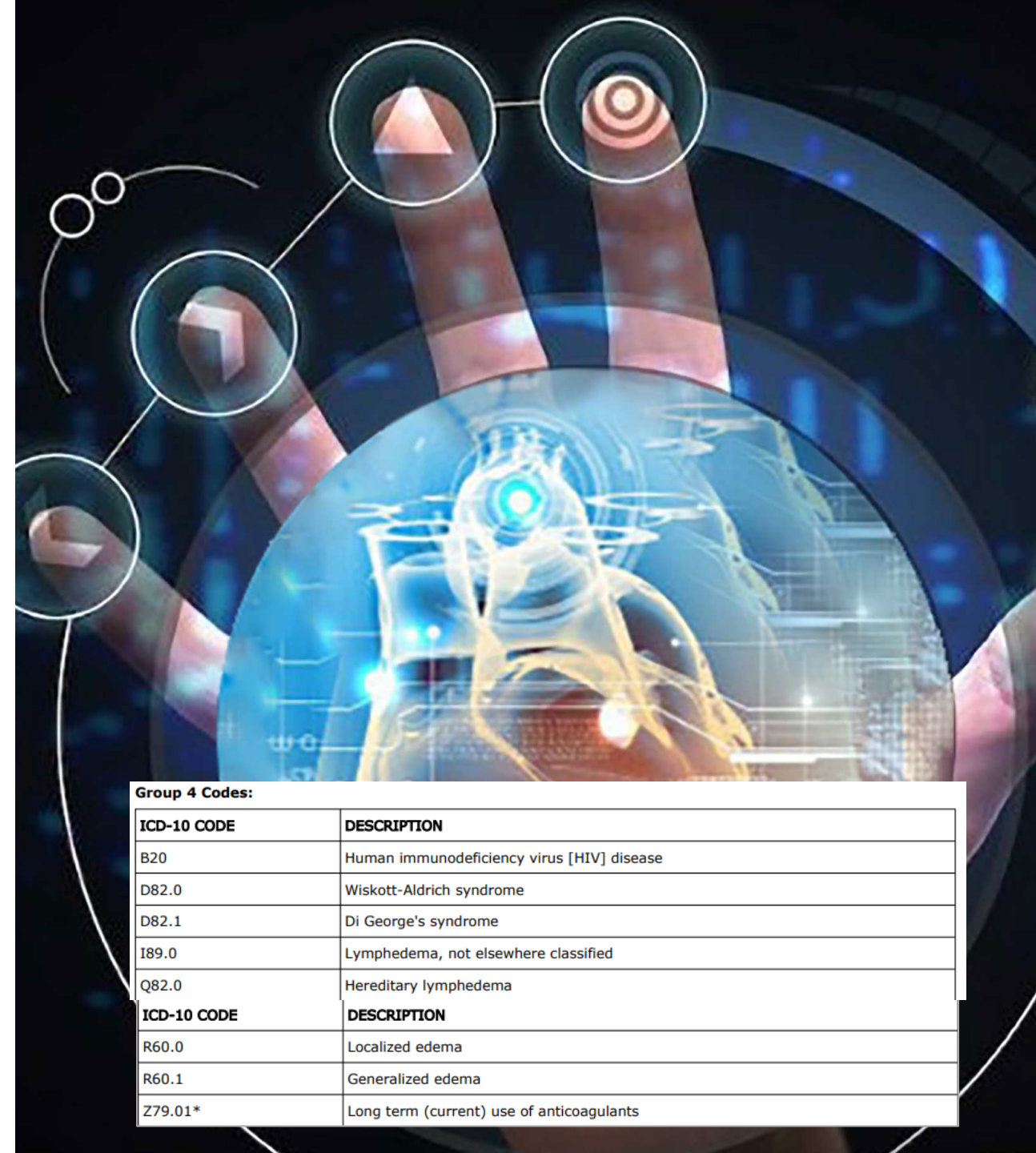
Pt has no neurological or vascular impairment



Must use Group 1 code as primary, followed by Group 4 code



If designated by an asterisk, must be under active care of DO or MD



Group 4 Codes:

ICD-10 CODE	DESCRIPTION
B20	Human immunodeficiency virus [HIV] disease
D82.0	Wiskott-Aldrich syndrome
D82.1	Di George's syndrome
I89.0	Lymphedema, not elsewhere classified
Q82.0	Hereditary lymphedema
ICD-10 CODE	DESCRIPTION
R60.0	Localized edema
R60.1	Generalized edema
Z79.01*	Long term (current) use of anticoagulants



Group 5

When billing CPT® codes 11720 or 11721 for the **treatment of mycotic nails, or onychogryphosis, or onychiauxis**, ICD-10 CM codes B35.1, L60.1, L60.2, L60.3 or L60.5, must be reported as **primary**, with one of the diagnoses below representing the patient's symptom and reported as the *secondary*.

Note: It is inappropriate to bill the debridement of nails on the leg(s) for which a patient has a prosthetic limb(s).

Documentation Components

01

If being carried out under a standing order, reference the date of the SO, today's exam findings, and clear procedure performance with pt tolerance and instructions.

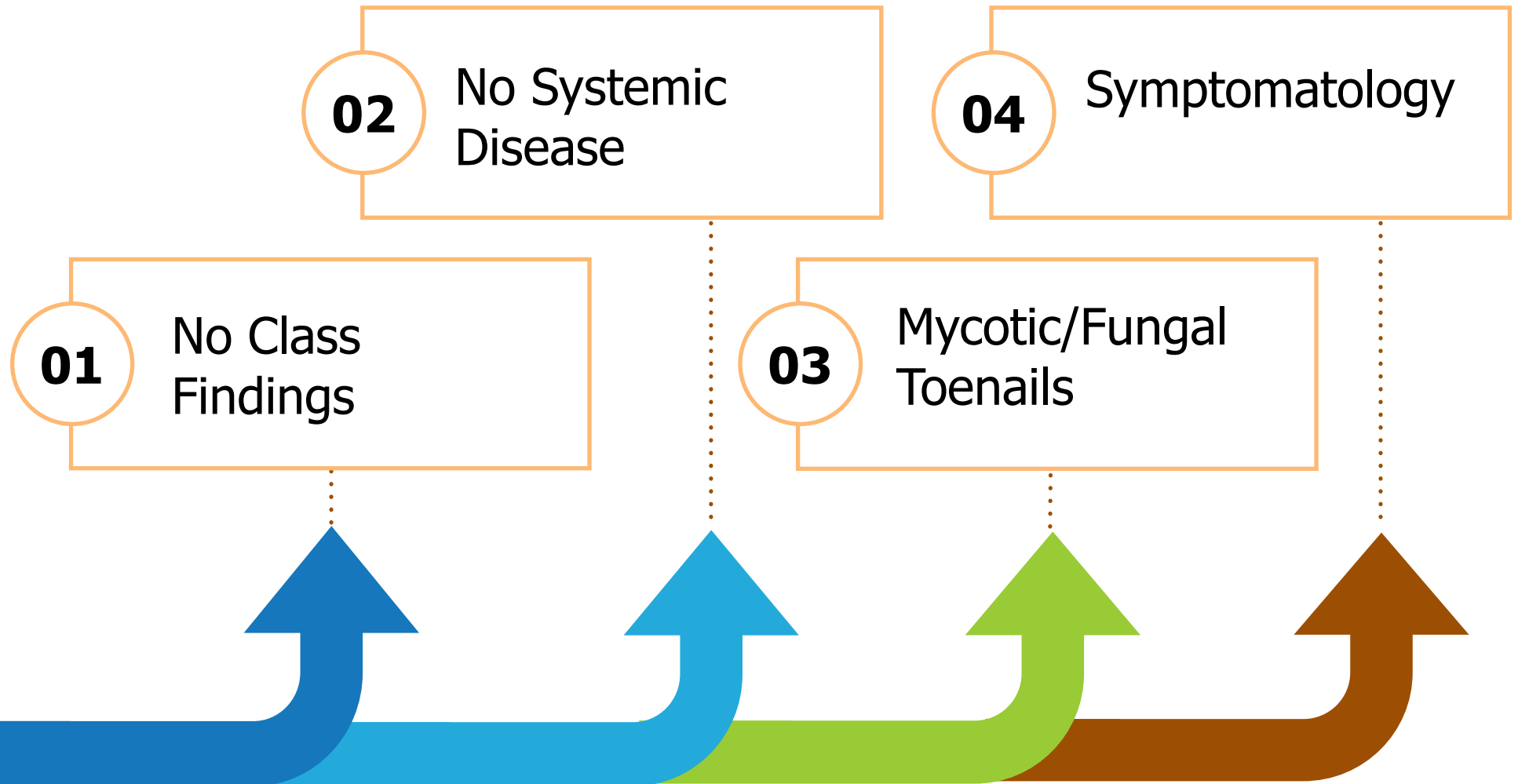
02

If incident-to today's E/M service, ensure appropriate diagnoses are represented, clearly document performance of procedure, tolerance, instructions.



“Otherwise Health Individuals”

To qualify for routine foot care for those not “At Risk”



Document for EACH of the affected toenails:

- Pain and/or
- Secondary infection and/or
- Marked limitation of ambulation and
- Clinical findings indicating fungal infection:
 - Thickness
 - Discoloration
 - Odor
 - Texture
 - Subungual Debris
- Active Treatment Plan

Tips for Great Documentation

01

All the affected toenails need to be identified

02

Thorough description of fungal infection for all the affected toenails

03

Secondary qualifying diagnosis (pain, difficulty w/ambulation, etc.) for all the affected toenails

04

Instrumentation used

05

Include the word "Debridement"



Wound Care CPT Coding



01

99211 is an excellent option when properly documented

02

Other options (such as nonselective debridement codes) may be available based on level of training/licensure and payer policy.

Ground Rules for 99211:



Typically, 99211 is a face-to-face encounter, but allowed via telehealth during the PHE.



The ordering practitioner has conducted the initial visit for the condition and established a treatment plan with an order for the incident-to service.

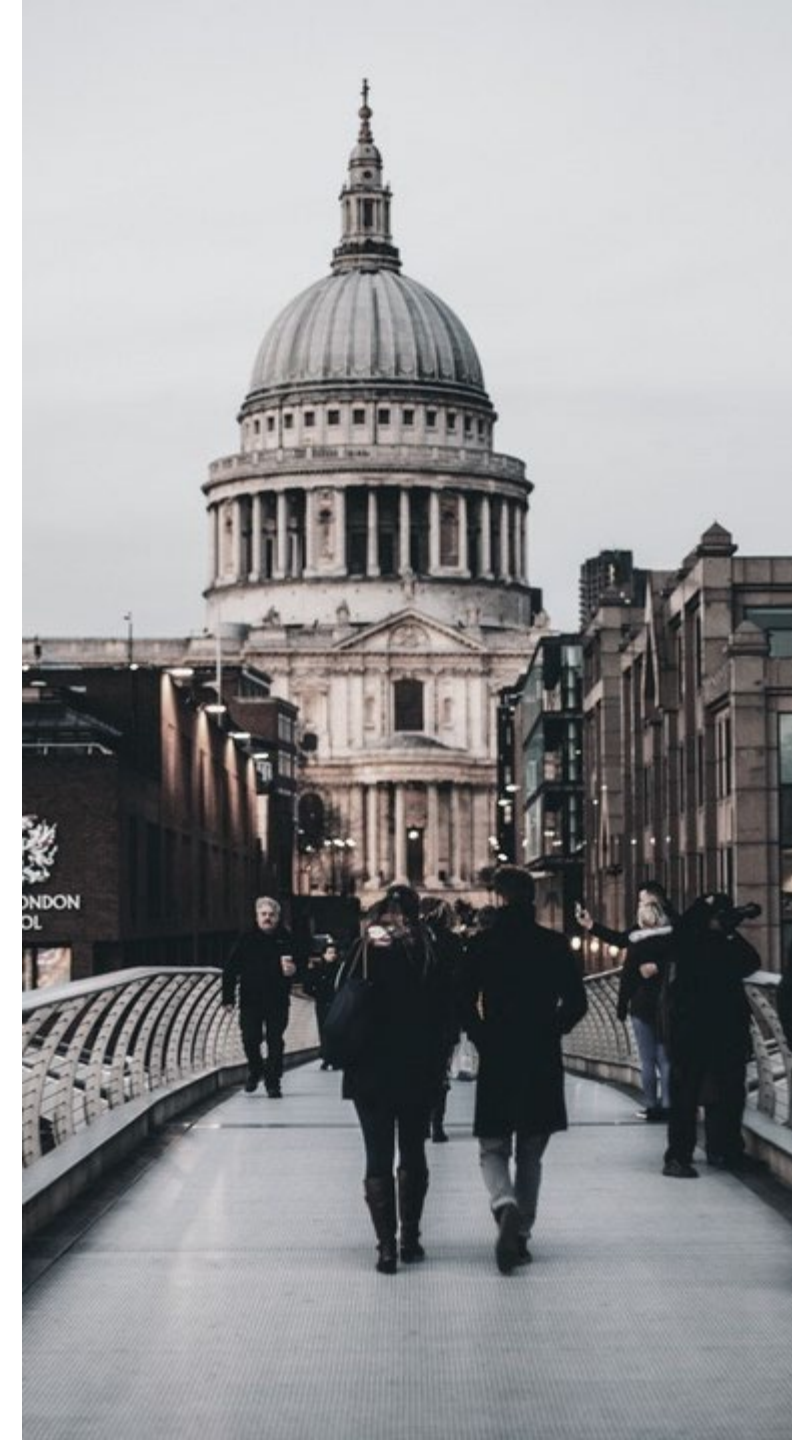
COVID specimen collection is the exception (for Medicare)



A supervising clinician must be in the office (or available via audio-visual during PHE) at the time of the nurse encounter. [Part B Medicare specific].



Evaluation of a new problem by clinical staff is not an incident-to service.



Ground Rules for 99211:

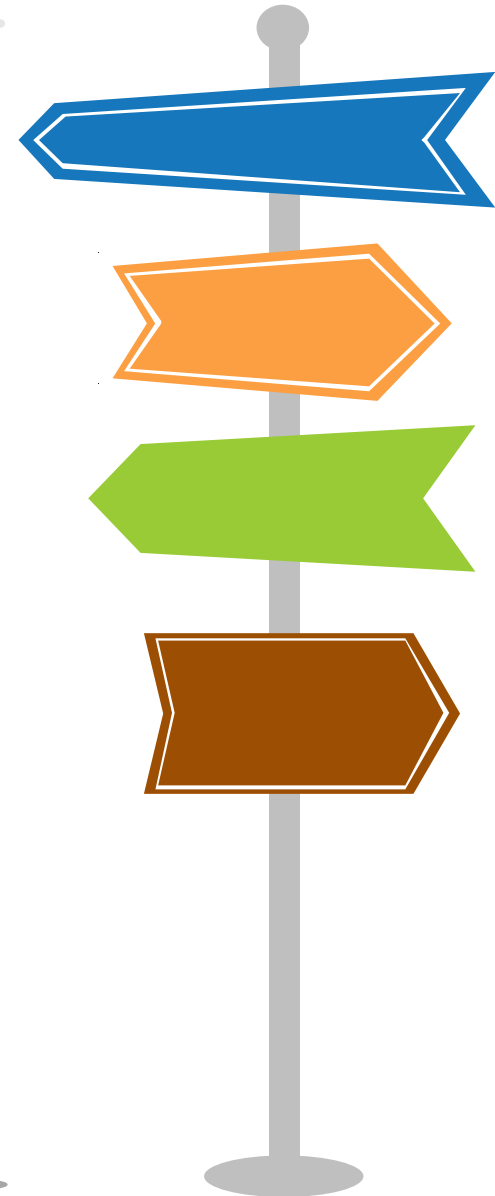
The service must be medically necessary and usual course of treatment

Service is within the performer's "scope of practice" and in accordance with state laws.

Nursing documentation should reflect:

- The order
- The reason for the service (diagnosis)
- Nursing assessment as indicated
- Nursing action as indicated
- Patient instructions
- Follow-up
- Nurse's legible SIGNATURE and credentials

Signed off by the supervising physician/practitioner.



Billed as 99211: How's the documentation?

9/6/21: Pt here in office. Bilat LE edema has improved. Weight 146 lbs., BP 122/68, RR 16, HR 80. Sent to lab.— J. Jones, RN

1. The order

5. Patient instructions

2. The reason for the service (diagnosis)

6. Follow-up

3. Nursing assessment as indicated

7. Nurse's legible SIGNATURE and credentials

4. Nursing action as indicated

99211? It depends on the documentation!

9/10/21: Blood Pressure recheck, 130/76. Improved from previous visit. Confirmed taking meds as directed.

-S. Hunter, LPN



9/10/21: FU BP

Patient is here for HTN follow-up per the request of Dr. Smith. Pt was started on a new antihypertensive 2 weeks ago. Confirmed taking medication as directed. He denies chest pain, SOB, cough, and vision changes. BP today is 130/76, improved from 160/100, wt unchanged from 180 lbs. Lungs are clear, heart RRR, no ankle edema. We reviewed his meds and diet plan. He will return as scheduled or call with any problems. Dr. Smith is onsite and informed of today's results. S. Hunter, LPN

99211? It depends on the documentation!

9/20/21: Wound examined, rebandaged. Results relayed to Dr. Smith. Finish antibiotic.
S. Jones, CMA



9/20/21: Follow-up cellulitis
At the request of Dr. Brown, pt is seen in f/u for cellulitis dx'd on 9/15 . Temp and other VS entered and are WNL. Patient states ankle pain is much improved. Notes some itching, as expected, but no streaking or warmth. Still taking antibiotics; taking as directed. States feeling much better. Exam of affected area shows significant improvement. Cleaned and rebandaged wound. Results shared w/ pt and Dr. Smith, onsite supervising physician. Nursing education completed, and instructions given. Pt will return PRN.
S. Jones, CMA

Will Your Documentation Support 99211?

EVALUATE YOUR PROCESS AND DOCUMENTATION:

1

Does the documentation identify the ordering/supervising physician?

“Direct supervision” means the physician must be physically present in the office suite or available via audio-visual communication during PHE.

2

Does the documentation identify the order?

3

Does the documentation identify evaluation and management?

4

Does the documentation identify the nurse with credentials?



Will Your Documentation Support 99211?

Evaluate your process and documentation:

05

Does your process identify the physician's involvement?

- Results and/or nursing information relayed to physician?
- Sign-off by the supervising physician/practitioner?

06

How often is the patient seen by the physician?

07

What instructions are given to the patient?

- Medication changes only or other instructions, e.g., regarding bleeding (call the office)...



Establish a Template for Clinical Staff



Follow SOAP format



Chief Complaint



Ordering practitioner



Pertinent HPI,
ROS and Exam



Confirm taking meds
as directed



Nursing education



Follow-up instructions



Communication with
ordering practitioner



How service was provided;
e.g., in-person or
interactive audio-visual

Coding Tools

DIABETES TYPE 2 (T2DM) (not an all inclusive list, see ICD-10)			
Type 2 Diabetes without complications	Code	Signs/Symptom Codes	
DM controlled and without complications	HCC 18	E11.9	R73.03
DM uncontrolled w/ hyperglycemia	HCC 18	E11.65	H53.9
DM uncontrolled w/ hyperglycemia, w/o coma	HCC 18	E11.649	R63.1
hyperglycemia, with coma	HCC 17	E11.641	R63.2
Always code for DM2 patient on insulin	HCC 29	☛Z79.4	R35.0
Long-term use oral hypoglycemic med (code both when used)	HCC 29	☛Z79.84	R20.0
DM with complication of neurological system, specifically:			R35.8
polyneuropathy	HCC 18	E11.42	R20.2
mononeuropathy	HCC 18	E11.41	R63.4
gastroparesis (autonomic polyneuropathy)	HCC 18	E11.43	
DM with unspecified neuropathy (avoid)	HCC 18	E11.40	
DM with neuropathic arthropathy	HCC 18	E11.620	
If the DM is not in control assign also	HCC 28	☛E11.65	
Diabetes w/complication of circulatory system, specifically:			
DM with peripheral angiopathy, no gangrene	HCC 18 & 108	E11.51	
DM w/peripheral angiopathy, w/ gangrene	HCC 18	E11.52	
DM with other circulatory complication	HCC 18	E11.50	
If the DM is not in control assign also	HCC 28	☛E11.65	
DM with diabetic nephropathy	HCC 18	E11.21	
DM with proteinuria or microalbuminuria: E11.29 and R80.9			
DM w/complication of CKD (also assign stage code)	HCC 18	☛E11.29	
CKD stage 1 GFR ≥90 (Glomerular Filtration Rate)		☛N18.1	
CKD stage 2 GFR 60-89 (Mild)		☛N18.2	
CKD stage 3 unspecified (Moderate)		☛N18.30	
CKD stage 3a GFR 45-59 (Moderate)		☛N18.31	
CKD stage 3b GFR 30-44 (Moderate)		☛N18.32	
CKD stage 4 GFR 15-29 (Severe)	HCC 187	☛N18.4	
CKD stage 5 GFR <15	HCC 186	☛N18.5	
End Stage Renal Disease (ESRD)	HCC 186	☛N18.6	
If the DM is not controlled, assign also	HCC 18	☛E11.65	
DM with complication of eyes, specifically:			
DM w/nonproliferative retinopathy w/o edema	HCC 18	E11.329	
with macular edema	HCC 18	E11.321	
DM w/proliferative retinopathy see choices	HCC 18	E11.351 - 359	
Each indicator must have 7th character for laterality			
DM with diabetic cataract	HCC 18	E11.36	
DM with eye complication not listed above	HCC 18	E11.39	
If the DM is not in control assign also	HCC 18	☛E11.65	
Diabetes - varied complications			
DM with: arthropathy	HCC 18	E11.628	
dermatitis	HCC 18	E11.620	
foot ulcer (Code also site I97.4, I97.5)	HCC 18 & 161	E11.621	
skin ulcer (Code also site I97.1-198.49)	HCC 18 & 161	E11.622	
other skin complication	HCC 18	E11.628	
DM with hyperemesis, without coma	HCC 17	E11.00	
hyperemesis, with coma	HCC 17	E11.01	
If DM is not in control assign also	HCC 18	☛E11.65	
Diabetes in pregnancy not here - see ICD10 Category O24 on pg.9			
Undercoding of insulin and/or oral antidiabetic medications: T38.3X6			
7th character considerations: Replace "-" with: A = Active treatment phase, D = Healing phase, S = Sequela			
Also code reason for Undercoding: Intentional d/t financial hardship Z91.120; Intentional for other reason Z91.128, Unintentional d/t age-related disability Z91.130; Unintentional d/t other reason Z91.138			
ICD10 Guidelines instruct to report all conditions that require or impact care today. See pg 25 for SDOH impacting care: ie, homelessness			
Report Nicotine influence with T2DM: ie, Current cigarette smoker F17.210. See page 18 for other nicotine coding options.			

BCA's Diagnosis Coding Booklet

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Coding advice or code assignments contained in this issue effective with discharges March



ICD-10-CM 2022 The Complete Official Codebook

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Five Basic Diagnosis Coding Rules

HIPAA MANDATED ICD-10 GUIDELINES – NO MATTER WHERE YOU WORK

1

The 1st listed dx identifies condition requiring the greatest work-effort as determined by the clinician and supported in the medical record.

2

Document all conditions that require/affect care.

3

Document reasons for all studies.

4

Code to the highest level of specificity known.

5

Do not use “rule out” or unconfirmed diagnoses; instead, report known signs and symptoms.



All Conditions Requiring/Impacting Care

Any conditions that may impede the healing process?

- Diabetes with circulatory or neurological manifestations?
- PVD or other vascular diseases?
- Smoking/exposure to tobacco smoke?
- Z91.19 Patient's noncompliance with other medical treatment and regimen

Any conditions that contribute to current condition?

- Z99.3 Dependence on wheelchair
- Z97.1- Presence of artificial limb (complete) (partial)
- Paralysis, hemiplegia, monoplegia, etc.

Questions?



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