Chronic Care Management in Practice: How, When, and Why to use the CCM & CCCM Codes to Maximize Provider Reimbursement

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November 29, 2018



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Chronic Care Management (CCM) & Complex Chronic Care Management (CCCM) Codes



Course Outline

- Overview of Care Management
- → The Codes: CCM and CCCM
- Required Service Elements
- Practitioner Eligibility and Billing
- → Patient Eligibility



Overview

- → The Centers for Medicare & Medicaid Services (CMS) recognizes that care management takes time and effort
- → CMS has established billing codes to account for the additional time and resources you spend assisting your Medicare patients - who may require additional help to stay on track with their treatments – in between their appointments
- → Chronic Care Management (CCM) and Complex Chronic Care Management (CCCM) are critical components of primary care that contribute to better outcomes and higher satisfaction for patients
- → Can be billed by specialist providers if all criteria is met



Overview

- CCM and CCCM payments can be made for services provided to patients who have two or more chronic conditions and who are at significant risk of death, acute exacerbation/decompensation, or functional decline
- → CMS data shows that two thirds of Medicare recipients have two or more chronic conditions, which means that many of your patients may benefit from CCM and CCCM services.
 - CCM and CCCM can enable the coordinated care your patients need and deserve between visits



Overview

- → CCM (sometimes referred to as "non-complex" CCM) and complex CCM (CCCM) services share a required set of service elements
- → CCM and CCCM differ in:
 - The amount of clinical staff service time provided
 - The involvement and work of the billing practitioner
 - The extent of care planning performed



CCM AND CCCM CODES



CCM AND CCCM CODES

	Chronic Care Management Codes: Summary
CPT 99490	 Chronic Care Management Services ≥20 minutes of clinical staff time per calendar month Directed by a physician or other qualified health care professional With the following required elements: Multiple (two or more) chronic conditions expected to last at least 12 months, or until the death of the patient Chronic conditions place the patient at significant risk of death, acute exacerbation/ decompensation, or functional decline Comprehensive care plan established, implemented, revised, or monitored Only one unit of service can be billed each calendar month Average 2018 reimbursement is \$43 adjusted based on geography
CPT 99487	Complex Chronic Care Management services • 60 minutes of clinical staff time per calendar month • Directed by a physician or other qualified health care professional With the following required elements: • Multiple (two or more) chronic conditions expected to last at least 12 months, or until the death of the patient • Chronic conditions place the patient at significant risk of death, acute exacerbation/ decompensation, or functional decline • Establishment or substantial revision of a comprehensive care plan • Moderate or high-complexity medical decision-making Average 2018 reimbursement is \$94
CPT 99489	Each additional 30 minutes of clinical staff time directed by a physician or other qualified health care professional, per calendar month (List separately in addition to code for primary procedure) Average 2018 reimbursement is \$47
CPT G0506	If the initial CCM/CCCM visit is complex and additional billing practitioner time and effort is needed, you can use HCPCS G0506 as an add-on to the initial visit Code G0506: \$64 add-on to the CCM/CCCM initiating visit, for the billing practitioner's time and effort personally providing extensive comprehensive assessment and CCM/CCCM care planning to patients, outside of the usual effort described by the initiating visit code Code G0506 is reportable once per CCM/CCCM billing practitioner, in conjunction with CCM/CCCM initiation

CCM & CCCM: REQUIRED SERVICE ELEMENTS



- Initiating Visit
- Patient Consent
- Structured Recording of Patient Information Using Certified EHR Technology
- → 24 hr a day /7 day a week Access & Continuity of Care
- Comprehensive Care Management
- Comprehensive Care Plan
- Management of Care Transitions
- → Home- and Community-Based Care Coordination
- Enhanced Communication Opportunities
- Medical Decision-Making



- → Initiating Visit
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Initiating Visit

- → Initiation during an Annual Wellness Visit (AWV), Initial Preventive Physical Exam (IPPE), or face-to-face E/M visit (any complexity, Level 4 or 5 visit not required)
- → Initiating visit is not part of CCM or CCCM, and is separately billed
 - If the CCM/CCCM initiating visit is complex, you may also report G0506 as an add-on code
- → For new patients or patients not seen within "past 12 months", provider needs to see the patient at one of the visit types below and to discuss CCM:
 - Annual Wellness Visit (AWV)
 - Comprehensive E/M (99202-99205, or 99212-99215)
 - Initial Preventive Physical Exam (IPPE)



NOTE:

→ The visit will not count as an initiating visit for CCM or CCCM if the practitioner does not discuss CCM or CCCM with the patient at that visit, and/or it is not well-documented



- → Initiating Visit
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Patient Consent

- Provider must inform the patient:
 - Of the availability of CCM or CCCM services
 - That only one practitioner can provide and be paid for these services during a calendar month
 - The patient has the right to stop the CCM or CCCM services at any time (effective at the end of the calendar month)
- → Providers should document in the patient's medical record that the required information was explained, and whether the patient accepted or declined the services
- → Written/signed patient consent is no longer required but is highly recommended

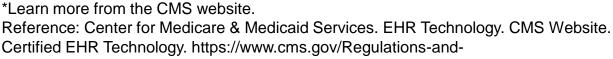


- → Initiating Visit
- → Patient Consent
- → Structured Recording of Patient Information Using Certified EHR Technology
- → 24 hr a day /7 day a week Access & Continuity of Care
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Structured Recording of Patient **Information Using Certified EHR Technology**

- → To capture CCM and CCCM, the provider is required to use certified EHR technology* and must capture:
 - Demographics
 - Problems
 - Medications
 - Medication allergies
- This information must be entered in the EHR and must inform the care plan and care coordination





- → Initiating Visit
- → Patient Consent
- → Structured Recording of Patient Information Using Certified EHR Technology
- → 24/7 Access & Continuity of Care
- → Comprehensive Care Management
- → Comprehensive Care Plan
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- → Home- and Community-Based Care Coordination
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- → Medical Decision-Making



24/7 Access & Continuity of Care

- → In order to bill for chronic care management, the practice must provide patients and caregivers with 24/7 access to qualified health care professionals or clinical staff to address urgent needs
- → Practice must provide continuity of care with a designated member of the care team with whom the patient is able to schedule successive routine appointments



- → Initiating Visit
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- → Structured Recording of Patient Information Using Certified EHR Technology
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Comprehensive Care Management

- Care management for chronic and complex conditions including:
 - Systematic assessment of the patient's medical, functional, and psychosocial needs
 - System-based approaches to ensure timely receipt of all recommended preventive care services
 - Medication reconciliation with review of adherence and potential interactions
 - Oversight of patient self-management of medications



- → Initiating Visit
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Comprehensive Care Plan

- → Creation, revision, and/or monitoring of an electronic plan of care that tracks health issues
- → Elements include:
 - A physical, mental, cognitive, psychosocial, functional, and environmental (re)assessment
 - An inventory of resources and supports
 - A comprehensive care plan for all health issues with particular focus on the chronic conditions being managed
- The plan of care should be reviewed periodically and shared with other providers as appropriate
- Care plan information must be electronically captured, and readily available to share with the patient and other care providers involved in the patient's care
- → A copy of the plan of care **must** be given to the patient and/or caregiver

- → Initiating Visit
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Management of Care Transitions

- → There must be evidence of management of care transitions, between and among health care providers and settings, including, but not limited to:
 - Referrals to other clinicians
 - Follow-up after an emergency department visit
 - Follow-up after discharges from hospitals, skilled nursing facilities, or other health care facilities
- → Create and exchange/transmit continuity of care document(s) in timely manner with other practitioners and providers



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Home- and Community-Based Care Coordination

- → Provider must coordinate with home- and community-based clinical service providers
- → Documentation of communication between and among homeand community-based providers regarding the patient's psychosocial needs and functional deficits must be evident in the patient's medical record



- → Initiating Visit
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Enhanced Communication Opportunities

- → Patients and their caregivers must have enhanced opportunities to communicate with their practitioner regarding the patients care by one or more of the following:
 - Telephone access
 - Secure messaging
 - Internet
 - Other secure methods



- → Initiating Visit
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Medical Decision-Making

→ Complex CCM (CCCM) services require moderate to highcomplexity medical decision-making by the provider, whether a physician, physician assistant, nurse practitioner or clinical nurse specialist



PRACTITIONER AND ENTITY ELIGIBILITY & BILLING



Entity Eligibility

- → Rural Health Clinics (RHCs) and Federally Qualified Health Centers (FQHCs)
- → Hospitals, including Critical Access Hospitals (CAHs)
- → Physician Practices

Note: Only one Physician, Non-Physician Provider (NPP), RHC or FQHC, and one hospital, can bill for CCM and CCCM for a patient during a calendar month



Practitioner Eligibility

- → Physicians
- → Non-physician practitioners (NPP) may bill CCM services including:
 - Clinical Nurse Specialists (CNSs)
 - Nurse Practitioners (NPs)
 - Physician Assistants (PAs)
- → The CCM and CCCM service is **not** within the scope of practice of limited license providers such as clinical psychologists, podiatrists, or dentists, although practitioners may refer or consult with such physicians and practitioners to coordinate and manage care



Clinical Staff Appropriate for 'Incident To' Reimbursement

- Clinicians whose time may be counted as "incident to":
 - Registered dietician
 - LMSW
 - BSW
 - Licensed Clinical Social Worker (LCSW)
 - MSW
 - Certified Medical Assistant (CMA/MA)
 - Registered Nurse (RN)
 - Licensed Practical/Vocational Nurse (LP/VN)
 - Pharmacist (Pharm)
 - Physical Therapist (PT)
 - Occupational Therapist (OT)
 - Note: Can count time spent by Advanced Practice Providers (NP, CNS, PA) who
 are not billing independently



Billing Specifics

- Do not use From / To billing dates
- → CCCM has a benefit cap of 360 minutes of care (6 hours) per calendar month
- → E/M visits are still billable outside of the CCM/CCCM time
 - Do not count the billable time twice!
- Tracking provider and clinical team time will be the biggest challenge
- Supplemental insurance/Medicaid will coordinate benefits with Medicare.
 - Patients could potentially be responsible for their deductible or coinsurance



Billing Appeals

- → CCCM billed over 360 minutes will be denied and will require provider appeal for a review and reconsideration for payment
- → CCCM appeals require:
 - Consent
 - A signed care plan
 - Chart notes of CCM initiating visit
 - Case notes of all clinical activity
 - Certification of Time Spent signed by practitioner (recommended)



Billing Prohibitions

- → CCM or CCCM may **not** be reported during the same period as the following:
 - G0181/G0182 (home health care/hospice supervision)
 - 90951-90970 (end-stage renal disease management)
 - 99495/99496 (transitional care management, 30 days)
 - Care Plan Oversight (CPO) Codes
 - Prolonged non-face-to-face services E/M codes



PATIENT ELIGIBILITY



Patient Eligibility for CCM & CCCM

- Patients must meet the following conditions:
 - Multiple (two or more) chronic conditions expected to last at least 12 months or until the death of the patient
 - Chronic conditions that place the patient at significant risk of death,
 acute exacerbation/decompensation, or functional decline
- → Patients must be enrolled in Medicare
- → Patients must live in the United States
 - CCM services are not covered if provided to patients that are located outside of United States (e.g. expatriates or Medicare recipients on vacation outside of the country)



Patient Eligibility: Settings

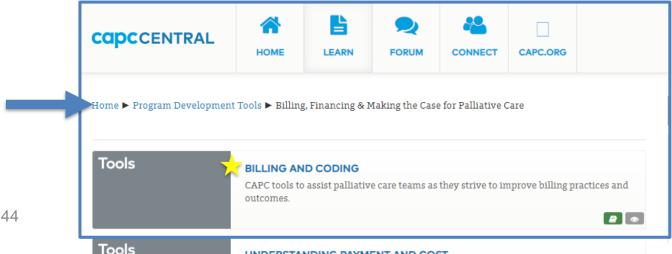
- → CCM and CCCM are reimbursed in both facility and nonfacility settings
- → The billing practitioner should report the Place of Service (POS) for the location where he or she would ordinarily provide face-to-face care to the beneficiary
- → For more information on facility vs non-facility POS see: https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM7631.pdf



CAPC Central Resources

→ Billing Toolkit

- CCM & CCCM Codes
 - Billing and Coding for Chronic Care Management (CCM) & Complex Chronic Care Management (CCCM) Codes





Care Management Services Comparison Table

	ССМ	CCCM	СРО	TCM
Eligible Patients	Multiple chronic conditions expected to last 12 months, or until the death	Multiple chronic conditions expected to last 12 months, or until the death	Requires complex multidisciplinary care Is enrolled with	Post discharge from facility Medium to high
	Chronic conditions place the patient at significant risk of death, acute exacerbation/ decompensation, or functional decline	Chronic conditions place the patient at significant risk of death, acute exacerbation/ decompensation, or functional decline Moderate or high complexity medical decision making	Face- to- face encounter with provider in last 6 months	medical complexity
Setting	All settings	All settings	Home	Home
	Bill POS where patient would normally be seen	Bill POS where patient would normally be seen	Domiciliary Assisted living	Domiciliary Assisted living
Eligible providers	MD, NPP (NP, PA, CNM, CNS) Entities – RHCs, FQHCs	MD, NPP (NP, PA, CNM, CNS)	MD, NPP	MD, NPP (NP, PA, CNS, CNM)
Required components	Patient consent	Patient consent	1. 30 minutes of time	1. Contact within 2 days
	2. Comprehensive care plan	2. Comprehensive care plan	2. Must be billed by calendar month	2. Face- to- face visit
	3. Coordination of care	3. Moderate to high complexity medical decision making		on day 7 (99495) or day 14 (99496)
	4. Enhanced communications5. Certified EHR	4. Coordination of care		
		5. Enhanced communications		
		6. Certified EHR		



Care Management Services Comparison Table (continued)

	ССМ	CCCM	СРО	TCM
"Incident to" billing	Yes	Yes	No* NP must be working with the MD who signed the Plan of Care	Yes
Documentation requirements	 Consent Comprehensive care plan 	 Consent Comprehensive care plan Electronic communications EHR 	 Develop or revision of care plans Review of records Adjust medications Coordinate care Document time spent Record HHA or Hospice NPI # on claim 	 Dates of service Medical decision making
Exclusions	Hospice or Home Health services ESRD services	TCM Hospice or Home Health services ESRD services	TCM service ESRD services Global surgical period	CPO ESRD services Prolonged non face- to- face codes Hospice or Home Health services Global surgical period CCM/CCCM



Questions?

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