NATIONAL CORRECT CODING INITIATIVE (NCCI)

Lauryn Davis & Christopher Lawhorn



WHO'S WHO IN MEDICAID





NC Division of Medical Assistance

Departments of Social Services



WHO'S WHO IN MEDICAID

Division of Medical Assistance

- Recipient and Provider Services
- Clinical Policy and Programs
- Managed Care
- o Quality, Evaluation, and Health Outcomes
- o Finance Management
- Budget Management
- Program Integrity
- IT and HIPAA



OVERVIEW

The Patient Protection and Affordable Care Act [(H.R. 3590) Section 6507 (Mandatory State Use of National Correct Coding Initiative)] requires State Medicaid programs to incorporate "NCCI methodologies" in their claims processing systems.

GENERAL BACKGROUND

The Centers for Medicare and Medicaid Services (CMS) developed the National Correct Coding Initiative (NCCI) to promote national correct coding methodologies and to control improper coding that leads to inappropriate payment of claims.

GENERAL BACKGROUND

The coding policies are based on coding conventions defined in the American Medical Association's Current Procedural Terminology (CPT) manual, national Medicare policies, coding guidelines developed by national societies, standard medical and surgical practice, and/or current coding practice.

NORTH CAROLINA MEDICAID IMPLEMENTATION

To comply with the NCCI mandate DMA will implement the two mandatory components on March 31, 2011.

Updates Available:

http://www.ncdhhs.gov/dma/provider/ncci.htm



NCCI EDITS CONSIST OF TWO TYPES OF EDITS:

1)Procedure-to-Procedure Edits (CCI Edits)

2)Medically Unlikely Edits (MUE)



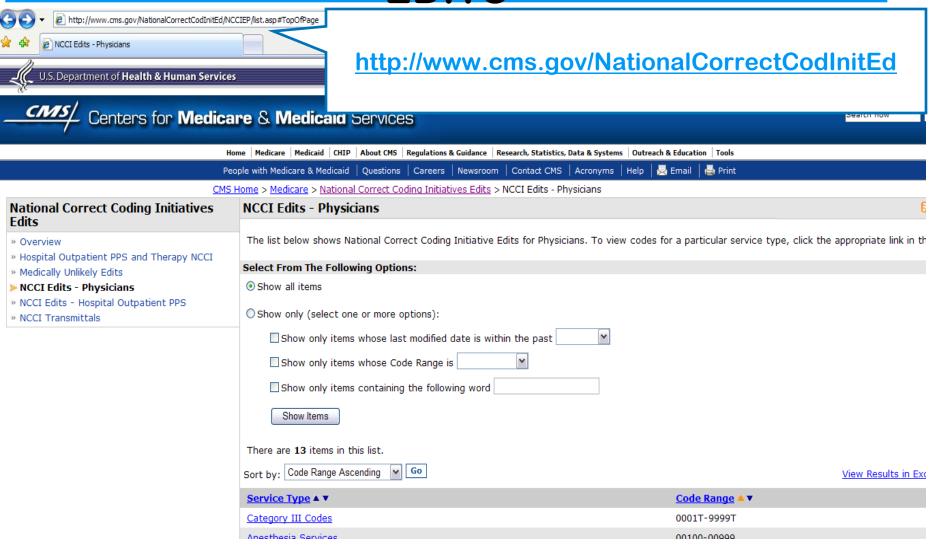
NCCI PROCEDURE-TO-PROCEDURE EDITS:

NCCI procedure-to-procedure (CCI) edits that define pairs of Healthcare Common Procedure Coding System (HCPCS) / Current Procedural Terminology (CPT) codes that should not be reported together for a variety of reasons



- Practitioner Services
- Ambulatory Surgical Centers
- Outpatient Hospital Services
 - oDrugs
 - ∘ Radiology
 - Laboratory Services





Practitioners

- oCertified Registered Nurse Anesthetists
- oChildren's Developmental Service Agencies
- o Chiropractors
- oCommunity Intervention Services
- oCritical Access Behavioral Health Agencies
- oDialysis Centers
- oFederally Qualified Health Centers
- oIndependent Laboratories

- oIndependent Outpatient Behavioral Health Therapists
- oIndependent Outpatient Specialized Therapists
- oLocal Education Agencies
- **ONurse Midwives**
- **ONUrse Practitioners**
- o Optometrists
- oPharmacies (non-Point-of-Sale)

**Please note this list is not All inclusive



Practitioners

- o Physician Services, such as
 - o Anesthesiology
 - Cardiology
 - Dermatology
 - o Full-time Emergency Room Physicians
 - o General/Family Practices
 - o OB/GYN Practices
 - o Osteopathy
 - Orthopedics/Hand Surgery
 - Pathology
 - Radiology
 - o Podiatry

- o Portable X-ray Services
- o Prosthetics and Orthotics Suppliers
- o Psychiatrists
- o Rural Health Clinics
- o School-Based Health Centers

**Please note this list is not All inclusive

*If necessary please note that you can utilize NCCI-associated Modifiers to bypass NCCI edits, if in accordance with coding guidelines and if applicable to the services rendered.



Outpatient Hospital Services

Drugs Radiology Laboratory Services

*If necessary please note that you can utilize NCCI associated modifiers to bypass NCCI edits, if in accordance with coding guidelines and if applicable to the services rendered.



Outpatient Hospital Services

Bill Type: 12X without condition code 41

14X without condition code 41

13X 75X and 74X

*If necessary please note that you can utilize NCCI-associated modifiers to bypass NCCI edits, if applicable to services rendered.



Outpatient Hospital Services

Revenue Codes:

RC250	RC301	RC312	RC409	RC634
RC251	RC302	RC314	RC610	RC635
RC252	RC304	RC319	RC611	RC636
RC254	RC305	RC350	RC612	
RC255	RC306	RC351	RC614	
RC258	RC307	RC352	RC615	
RC257	RC309	RC359	RC616	
RC259	RC310	RC402	RC618	
RC300	RC311	RC404	RC619	



DMA SAMPLE CCI EDITS

Accepted Procedure Code	Accepted Procedure Code Description	Rejected Procedure Code	Rejected Procedure Code Description
	Shaving of epidermal or		Use of Operating
11300	dermal lesions	69990	Microscope
	Excisions of benign		
21406	mandible cyst	43752	Nasogastric tube placement
40652	Repair lip, up to half of the vertical height	46654	Repair lip, over half vertical height

***Note: This list is as of Jan 2011 and is subject to change.



NCCI MEDICALLY UNLIKELY EDITS:

Medically Unlikely Edits (MUE) these are unitsof-service edits. This component defines for each HCPCS/CPT code the number of units of service that is unlikely to be correct.



- Practitioner Services
- **OAmbulatory Surgery Centers**
- Outpatient Hospital Services
- **Ourable Medical Equipment Suppliers**



Practitioners

- oCertified Registered Nurse Anesthetists
- oChildren's Developmental Service Agencies
- o Chiropractors
- oCommunity Intervention Services
- oCritical Access Behavioral Health Agencies
- oDialysis Centers
- Federally Qualified Health Centers
- oIndependent Laboratories

- oIndependent Outpatient Behavioral Health Therapists
- oIndependent Outpatient Specialized Therapists
- oLocal Education Agencies
- **ONurse Midwives**
- **ONurse Practitioners**
- Optometrists
- oPharmacies (non-Point-of-Sale)

**Please note this list is not All inclusive



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- o Physician Services, such as
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Outpatient Hospital Services

Drugs
Radiology
Laboratory Services

*If necessary please note that you can utilize NCCI associated modifiers to bypass NCCI edits, if in accordance with coding guidelines and if applicable to the services rendered.



Outpatient Hospital Services

Bill Type: 12X without condition code 41

14X without condition code 41

13X 75X and 74X

*If you are not currently allowed to submit with modifiers; please note that you can utilize NCCI-associated modifiers to bypass NCCI edits.



Outpatient Hospital Services

Revenue Codes:

RC250	RC301	RC312	RC409	RC634
RC251	RC302	RC314	RC610	RC635
RC252	RC304	RC319	RC611	RC636
RC254	RC305	RC350	RC612	
RC255	RC306	RC351	RC614	
RC258	RC307	RC352	RC615	
RC257	RC309	RC359	RC616	
RC259	RC310	RC402	RC618	
RC300	RC311	RC404	RC619	



DMA SAMPLE MUE EDITS

Procedure Code	Procedure Code Description
99284	ER Visit/units 1
E0443	Portable oxygen contents gaseous 1 month=1unit/units 4
32440	Removal of lung/units 1
50610	Ureterolithotomy, upper 1/3 of ureter/units 2
35206	Repair blood vessel, hand/units 3

***Note: This list is as of Jan 2011 and is subject to change.



WHEN WILL THE CHANGES TAKE PLACE?

When the edits are implemented in March 2011, CCI and MUE edits will impact claims with dates of service on and after March 31,2011.



WHAT TO LOOK FOR....?

The CCI and MUE edit explanation of benefits (EOBs) will appear on the provider's Remittance and Status (RA) Report.



WHAT TO LOOK FOR...?

 EOB 9988 – "Payment of procedure code is denied based on CCI editing"

 EOB 9953 – "Payment of procedure code is denied based on MUE editing"



WHAT TO LOOK FOR...?

EOB 9955 - "Claim recouped based on CCI editing"

EOB 9956 – "Detail recouped based on CCI editing"



WHAT TO LOOK FOR....?

North Carolina Medicaid - Remittance and Status Advice

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1	Provider 1				Date:	02/15/2	011		Page	. 3			
Name	Service Da	tes Days/	Procedu	re/Accommodation/	i	Total	Non	Total	Payable	Payable	Other	Paid	Exp
Recipient ID	From To	Units	DrugC	ode and Description	i_	Billed	Allow	Allowed	Cutback	Charge	DedChg	Amount	Codes
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YTD TOTAL	909	41863.94	.00	41863.94	.00	4186	:	.0		.08	.0		1863.8
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		PAYE	R ID: HP ENTE	RPRISE SERVICES	S , LLC,	PO BO	X 30968 F	ALEIGH, NC	27622 #				
				THAT HAVE BEEN	N ASSIGNED T	o you. I	F ANY OF	THE					
NUMBERS ARE	INCORRECT,	PLEASE SEND C	ORRECTIONS TO:										
		HP	OW 200000										
			OX 300009	OT TWA 07.000									
			IGH, NORTH CAR NTION: PROVIDE										
		CLIA -	NIION: PROVIDE	R ENROLLMENT									
		DEA -											
FOR BILLING	OUESTIONS/		HP PROVIDER	SERVICES 1-800-	-688-6696 OR								
	-	NSE (AVR)SYSTE											
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CLAIMS SUBMI	SSION/RECI	PIENT ELIGIBIL	ITY VERIFICATI	ON WEB TOOL (NO	CECSWEB TOOL) AT HTTP	://WEBCI	AIMS.NCMED	ICAID.COM	/NCECS.			
A DENIAL DUE	TO AN NCC	I EDIT MAY BE	APPEALED BY TH	E PROVIDER. TH	HE PROVIDER	MAY NOT B	ĻLL A MEI	ICAID RECI	PIENT FOR	AN NCCI I	ENIAL.		
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		73 CLAIM PAID											
		98 FEE ADJUSTE				D.T.M.							
	NCXIX 99	88 PAYMENT OF	PROCEDURE CODE	IS DENIED BASE	ED ON NCCI E	DIT							
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REMITTANCE AND STATUS NCCI ACCESS

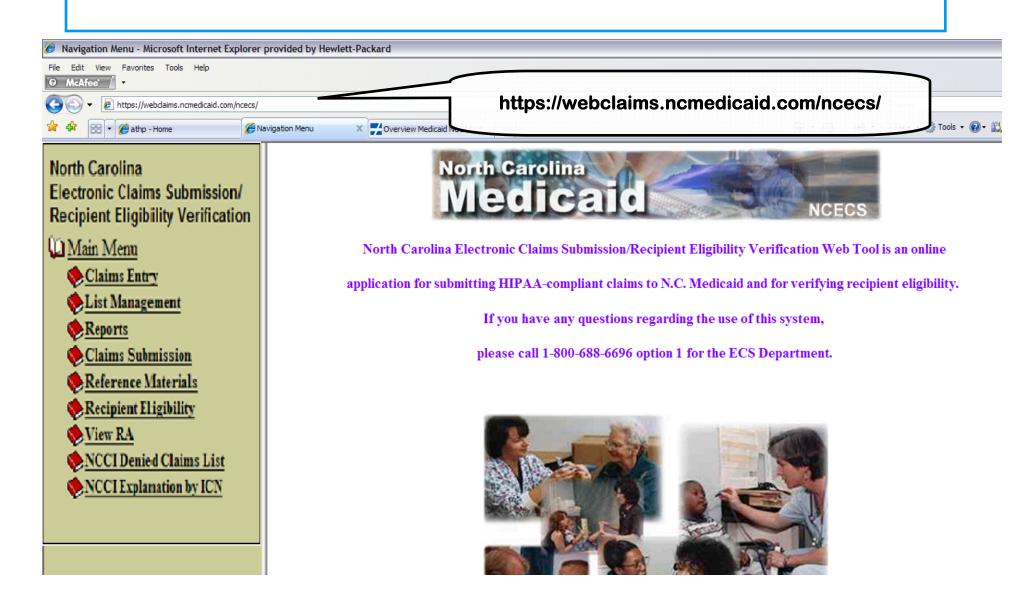
Providers who currently have an NCECSWeb Tool logon ID and password and can view their RA in PDF format will be automatically enrolled for access.

If you do not currently have an NCECSWeb Tool logon ID and password, you must complete a *Remittance and Status Reports in PDF Format/NCCI Information Request Form*.

http://www.ncdhhs.gov/dma/provider/forms.htm



REMITTANCE AND STATUS NCCI ACCESS



REMITTANCE AND STATUS NCCI ACCESS

New Books Added to NCECSWeb Tool:





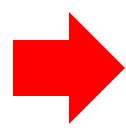
ACCESSING NCCI EXPLANATIONS

NCCI Denied Claims List

North Carolina Electronic Claims Submission/ Recipient Eligibility Verification

Main Menu

- Claims Entry
- List Management
- Reports
- Claims Submission
- Reference Materials
- Recipient Eligibility
- View RA
- NCCI Denied Claims List
- NCCI Explanation by ICN



ICN	FDOS	TDOS	PCode	Bill Amt
252011001222222	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001333333	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001444444	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001444444	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001555555	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001666666	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001777777	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011001888888	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
Paid Date: MM/DD	YYYY			
252011999123123	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011999321321	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011999456789	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011999456789	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
252011998878787	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99





ACCESSING NCCI EXPLANATIONS

NCCI Explanation by ICN

ICN	FDOS	TDOS	PCode	Bill Amt
999999999999999999999999999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	99999999.99
999999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99

Next

Back to ICN Entry Screen



ACCESSING NCCI EXPLANATIONS

Audit 1

CCI | MCD

Payment of 36600 is denied because it is not payable with 43753 based on an ncci edit.

Details

Claim Number	Line	HCPCS	Modifier	Units	Creation Source	Role in Audit	Action
	002	36600		1	Submitted on Claim	Action Required	Not Reimbursable
	003	43753		1	Submitted on Claim	Considered in Determination	None

Sources

Center for Medicare Services | CMS Guidelines

Effective from 10/01/2010 through current

The Patient Protection and Affordable Care Act requires Medicaid to adopt NCCI methodologies. NCCI procedure-to-procedure edits are pairs of HCPCS/CPT codes consisting of a column one code and a column two code. The edit defines two codes that should not be reported together for a variety of reasons. If both codes are reported, the column one code is eligible for payment and the column two code is denied.



ACCESSING NCCI EXPLANATIONS

NCCI Explanation by ICN

North Carolina
Electronic Claims Submission/
Recipient Eligibility Verification

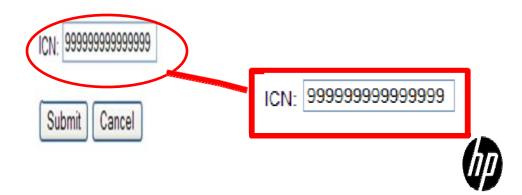
Main Menu
Claims Entry
List Management
Reports
Claims Submission
Reference Materials
Recipient Eligibility
View RA
NCCI Denied Claims List
NCCI Explanation by ICN

Enter the ICN for which you want a detailed explanation

The ICN entered must belong to the provider associated with the logged on user ID.



If more than one claim was denied for NCCI edits on entered ICN, a list of information for those will be displayed and you will be able to select the specific detail from that list



ACCESSING NCCI EXPLANATIONS

NCCI Explanation by ICN

ICN	FDOS	TDOS	PCode	Bill Amt
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
999999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
9999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99
999999999999999999999999999999999999999	MM/DD/YYYY	MM/DD/YYYY	XXXXX	999999999.99

Prev Next

Back to ICN Entry Screen



ACCESSING NCCI EXPLANATIONS

NCCI Explanation by ICN

Audit 3

MUE | MCD

Units of 99218 exceed medically unlikely edit.

Details

Claim Number	Line	HCPCS	Modifier	Units	Creation Source	Role in Audit	Action
	16	99218		29	Submitted on Claim	Action Required	Not Reimbursable

Sources

Center for Medicare Services | CMS Guidelines

Effective from 10/01/2010 through current

Per The Act, State Medicaid programs are required to implement NCCI methodologies into claims processing systems. MUE units of service edits are coding edits, not utilization or payment edits. These edits are based on anatomic considerations.



REMINDER

- Providers must report services correctly
- Providers should not report multiple HCPCS/CPT codes when a single comprehensive HCPCS/CPT code describes these services
- Providers should not fragment a procedure into component parts
- Providers should not unbundle a bilateral procedure code into two unilateral procedure codes
- Providers must avoid down coding
- Providers must avoid up coding
- Providers must report units of service correctly



Procedure-to-Procedure Process

HOW TO KNOW IF A CLAIM CAN BE MODIFIED

http://www.cms.gov/NationalCorrectCodInitEd

Downloads

How to Use The National Correct Coding Initiative (NCCI) Tools [PDF, 2.94MB]



CR5824 [PDF 154KB] 📆



NCCI Policy Manual for Medicare Services, Version 16.3 - Effective October 1, 2010 [PDF/ZIP 551KB]



Medicare Claims Processing Manual (Sec. 20.9) [PDF, 1.2MB]



Modifier 59 Article: Proper Usage Regarding Distinct Procedural Service [PDF, 20KB] 🌠





Procedure-to-Procedure Process

Service Type Service	Code Range ▲ ▼
Category III Codes Type	0001T-9999T
Anesthesia Services	00100-00999
Anesthesia Services	01000-09999
Surgery: Integumentary System Code	10000-19999
Surgery: Musculoskeletal System Range	20000-29999
Surgery: Respiratory, Cardiovascular, Hemic and Lymphatic Systems	30000-39999
Surgery: Digestive System	40000-49999
Surgery: Urinary, Male Genital, Female Genital, Maternity Care and Delivery Systems	50000-59999
Surgery: Endocrine, Nervous, Eye and Ocular Adnexa, Auditory Systems	60000-69999
Radiology Services	70000-79999



Procedure-to-Procedure Process

			Deletion Date	Modifier 0=not allowed 1=allowed	
Column 1	Column 2	Effective Date	*=no data	9=not applicable	
90378	G0345	20050101	20050101	9	
90378	G0347	20050101	20050101	9	
90378	36000	20021001	*	1	
90378	36410	20021001	*	1	
90378	90780	20010701	20041231	1	
90378	90783	20010701	20041231	0	
90378	90784	20010701	20041231	0	
90378	90788	20010701	20041231	0	
90460	G0008	20110101	*	1	
90460	G0009	20110101	*	1	
90460	G0010	20110101	*	1	



Modifier Indicator	Definition
"0" Not Allowed	There are no modifiers associated with NCCI that are allowed to be used with this code pair; there are no circumstances in which both procedures of the code pair should be paid for the same beneficiary on the same day by the same provider.
"1" Allowed	The modifiers associated with NCCI are allowed with this code pair when appropriate.



Procedure-to-Procedure Process

If the NCCI edit responsible for an NCCI denial has a modifier indicator of "0", an appeal can NEVER overturn the denial with one exception. An administrative law judge can determine that the denied column two code should be paid.



Procedure-to-Procedure Process

If the NCCI edit responsible for an NCCI denial has a modifier indicator of "1" the provider can make modifications to the previously submitted claim and should do so by updating the claim with the necessary information and resubmit as a new day claim.



Procedure-to-Procedure Process

If a provider reports the two codes of an edit pair, the column two code is denied, and the column one code is eligible for payment. However, if it is clinically appropriate to utilize an NCCI-associated modifier, both the column one and column two codes are eligible for payment. NCCI-associated modifiers and their appropriate use can be found on the CMS website:

http://www.cms.gov/MedicaidNCCICoding/



Overview

- » NCCI Appeals
- Correspondence Language Manual & CLEID
- » Medicare Modifier 59 Article
- » NCCI and MUE Edits

The Patient Protection and Affordable Care Act ((H.R. 3590) Section 6507 (Mandatory State Use of National Co State Medicaid programs to incorporate "NCCI methodologies" in their claims processing systems by October 1, 2 National Correct Coding Initiative (NCCI) to promote national correct coding methodologies and to control impro payments in Medicare Part B claims. The purpose of the NCCI edits is to prevent improper payments when inco

NCCI edits consist of two types of edits:

- 1) NCCI procedure-to-procedure edits that define pairs of Healthcare Common Procedure Coding System (HCPC codes that should not be reported together for a variety of reasons; and
- 2) Medically Unlikely Edits (MUE), units-of-service edits, that define for each HCPCS / CPT code the number of u number of units of service is unlikely to be correct (e.g., claims for excision of more than one gallbladder or more

Section 6507 of the Affordable Care Act (ACA) requires that, by September 1, 2010, CMS must notify States of "compatible" with claims filed with Medicaid that would promote correct coding and control improper coding lead under Medicaid. The CMS will be issuing a State Medicaid Director Letter for this purpose. The CMS must also r that should be incorporated into claims filed with Medicaid for which no national correct coding methodology has must incorporate these methodologies into Medicaid claims filed on or after October 1, 2010. By March 1, 2011, with an analysis supporting these methodologies.

Downloads

NCCI File Names and Formats, Algorithms for Processing Claims, and Characteristics of Edits [62KB PDF]



MUE Process

How to Determine the allowed Units of Services

National Correct Coding Medically Unlikely Edits **Initiatives Edits** The CMS developed Medically Unlikely Edits (MUEs) to reduce MUE for a HCPCS/CPT code is the maximum units of service the » Overview circumstances for a single beneficiary on a single date of serv » Hospital Outpatient PPS and MUE. Therapy NCCI Medically Unlikely Edits MUE was implemented January 1, 2007 and is utilized to adjud » NCCI Edits - Physicians and DME MACs. » NCCI Edits - Hospital Outpatient PPS This webpage has links to the MUE Frequently Asked Question » NCCI Transmittals the Publication Announcement Letter which explain most aspe Although CMS publishes most MUE values on its website, other and CMS Contractors' use only. The latter group of MUE value publish them. Downloads Practitioner Services MUE Table [ZIPPED Excel, 131KB] - Updated 4/1/10 🗐 Facility Outpatient Services MUE Table [ZIPPED Excel, 99KB] - Updated 4/1/10 🗐 DME Supplier Services MUE Table (Note: This file will include HCPCS A-B, D-H, K-V codes at this time and will not just include HCPCS codes under DME MAC jurisdiction) [ZIP, 25KB] - Updated 4/1/10 MUE Publication Announcement Letter [PDF, 52KB]



MUE Process

How to Determine the allowed Units of Services

HCPCS/CPT Code MUE

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86335	2
86336	1
86337	1
86340	1
86341	1
86343	1
86344	1
86355	1
86357	1

APPEALS PROCESS

Providers may submit a letter requesting reconsideration of a CCI/MUE denial to DMA at the address listed below. The request must include documentation supporting medical necessity.

Division of Medical Assistance Appeals Unit Clinical Policy and Programs 2501 Mail Service Center Raleigh, NC 27699-2501



Additional information is available on the CMS website:

http://www.cms.gov/MedicaidNCCICoding/

This site is complete with the following information:

- General Overview
- Medicaid NCCI Coding Policy Manual
- Additional Information on Coding Policies and Edits
- oFederal Appeals Guidelines and Information
- oFAQs and a How To Manual





U.S. Department of Health & Human Services

CIVIS/ Centers for Medicare & Medicaid Services

Home Medicare Medicaid CHIP About CMS Regulations & Guidance Research, Statistics, Data & Systems Outreach & Ed

People with Medicare & Medicaid Questions Careers Newsroom Contact CM\$ Acronyms Help Email Prin

<u>CMS Home</u> > <u>Medicaid</u> > <u>Medicaid NCCI Coding</u> > Overview

Medicaid NCCI Coding

Overview

- COTS Software
- » NCCI Appeals
- Correspondence Language Manual & CLEID
- » Medicare Modifier 59 Article
- NCCI and MUE Edits

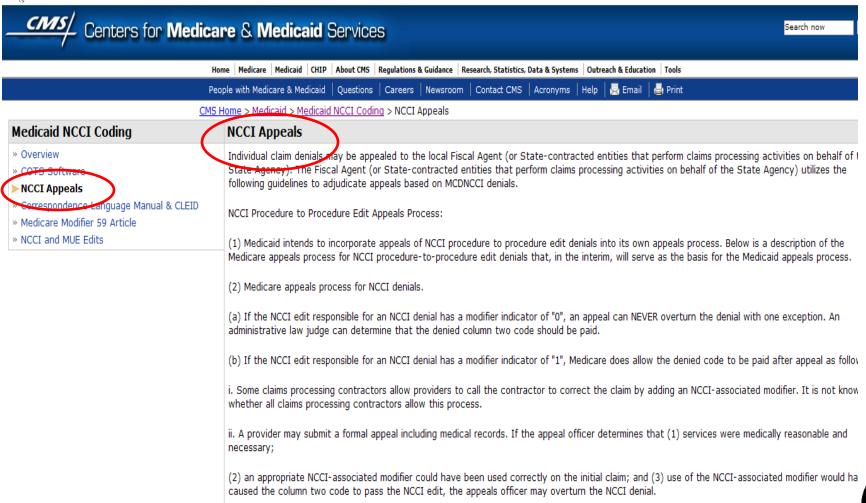
Overview

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Madicare Modifier 59 Article

NCCI and MUE Edits

(2) Medically Unlikely Edits (MUE), units-of-service edits, that define for each HCPCS number of units of service is unlikely to be correct (e.g., claims for excision of more

Each type of file is provided in both Excel 2007 (.xlsx) file and the tab-delimited text view codes for a particular edit and service type, click the appropriate link in the lis

These files will be updated quarterly with the first Version 1.3 having an effective day

Downloads

Medicaid NCCI Edits for Hospital Services [ZIP 12MB]



Medicaid NCCI Edits for Practitioner Services [ZIP 13MB]



Medicaid MUE Edits for Hospital Services [ZIP 86KB]



Medicaid MUE Edits for Practitioner Services [ZIP 101KB]



Medicaid MUE Edits for Supplier Services [ZIP 30KB]



Related Links Inside CMS



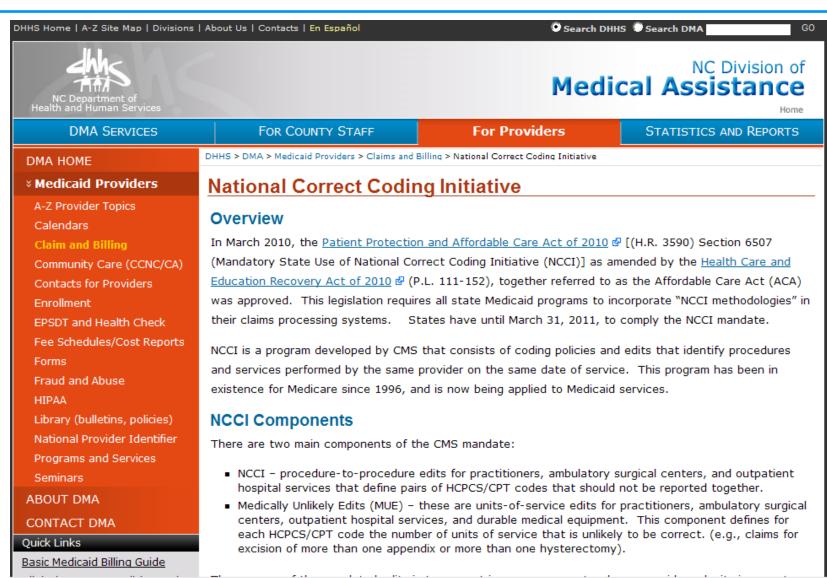
Additional information is available on the DMA website:

http://www.ncdhhs.gov/dma/provider/ncci.htm

This site is complete with the following information:

- General Overview
- North Carolina Implementation Information
- oLinks to NCCI related Bulletins
- oLinks to CMS website







Providers/suppliers who have concerns regarding specific NCCI edits can submit comments in writing to:

> **National Correct Coding Initiative Correct Coding Solutions LLC**

> > P.O. Box 907

Carmel, IN 46082-0907

Attention: Niles R. Rosen M.D. Medical Director and Linda S. Dietz RHIA CCS CCS-P Coding Specialist

Fax #: 317-571-1745



EARLY AND PERIODIC SCREENING, DIAGNOSIS, AND TREATMENT (EPSDT)



MEDICAID FOR CHILDREN

Contacts: Frank Skwara, MA, LMFT, BSN, RN

EPSDT Nurse Consultant

Division of Medical Assistance

Telephone #: 919-855-4260

FAX #: 919-715-7679

WHY HEALTH CHECK/ EPSDT ARE IMPORTANT

- ➤ Promotes preventative health care by providing for early and regular medical and dental screenings.
- ➤ Provides medically necessary health care to correct or ameliorate a defect, physical or mental illness, or a condition [health problem] identified through a screening.



HEALTH CHECK/EPSDT OVERVIEW

- ➤ Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) defined by federal law and includes:
 - Periodic Screening Services
 - Vision Services
 - Dental Services
 - Hearing Services
 - Other Necessary Health Care



EPSDT OVERVIEW CON'T.

Recipients under 21 must be afforded access to the full array of EPSDT services within the scope of the category of services listed in the federal law at 42 U.S.C. § 1396d(a) [1905(a) of the Social Security Act]. Refer to the EPSDT provider web page or the Health Check or Basic Medicaid Billing Guides for a listing of these services.

NOTE: Under EPSDT, North Carolina Medicaid must make available a variety of individual and group providers qualified and willing to provide EPSDT services.

EPSDT CRITERIA

- ➤ Must be listed in the federal law at 42 U.S.C. § 1396d(a) [1905(a) of the Social Security Act].
- ➤ Must be medically necessary "to correct or **ameliorate** a defect, physical or mental illness, or a condition [health problem] identified by screening".

EPSDT CRITERIA CON'T.

"Ameliorate" means to:

- improve or maintain the recipient's health in the best condition possible,
- •compensate for a health problem,
- prevent it from worsening, or
- prevent the development of additional health problems.

EPSDT Criteria CON'T.

Must be determined to be medical in nature.

- Must be generally recognized as an accepted method of medical practice or treatment.
- Must not be experimental, investigational.
- Must be safe.

EPSDT FEATURES

- No Waiting List for EPSDT Services
- No Monetary Cap on the Total Cost of EPSDT Services
- No Upper Limit on the Number of Hours under EPSDT
- No Limit on the Number of EPSDT Visits to a Physician, Therapist, Dentist or Other Licensed 66

EPSDT FEATURES CON'T.

- ➤No Set List that Specifies When or What EPSDT Services or Equipment May Be Covered
- ➤ No Co-payment or Other Cost to the Recipient
- ➤ Coverage for Services that Are Never Covered for Recipients Over 21 Years of Age
- ➤ Coverage for Services Not Listed in the N.C. State Medicaid Plan



IMPORTANT POINTS ABOUT EPSDT

The full array of EPSDT services must be coverable within the scope of those listed in the federal law at 42 U.S.C. § 1396d(a) [1905(a) of the Social Security Act] EPSDT requires Medicaid to cover these services if they are medically necessary to correct or ameliorate a defect, physical or mental illness, or a condition [health problem].

Important Points About EPSDT CON'T.

EPSDT services do not have to be services that are covered under the North Carolina State Medicaid Plan or under any of the Division of Medical Assistance's (DMA) clinical coverage policies or service definitions or billingcodes.

Important Points About EPSDT CON'T.

>EPSDT covers short-term and long-term services as long as the requested services will correct or ameliorate the child's condition. For example, a service must be covered under EPSDT if it is necessary for immediate relief (e.g., pain medication). Treatment need not ameliorate the child's condition taken as a whole, but need only be medically necessary to ameliorate one of the child's diagnoses or medical conditions.



EPSDT OPERATIONAL PRINCIPLES

➤ The specific coverage criteria (e.g., particular diagnoses, signs, or symptoms) in the DMA clinical coverage policies or service definitions do **NOT** have to be met.

The specific numerical limits (number of hours, number of visits, or other limitations on scope, amount or frequency) in DMA clinical coverage policies, service definitions, or billing codes do **NOT** apply. This includes the hourly limits on Medicaid Personal Care Services (PCS).



EPSDT OPERATIONAL PRINCIPLES CON'T.

- ➤Other restrictions in the clinical coverage policies, such as the location of the service (e.g., PCS only in the home), prohibitions on multiple services on the same day or at the same time (e.g., day treatment and residential treatment) must also be waived under EPSDT.
- ➤Out of state services are **NOT** covered if medically necessary similarly efficacious services are available in North Carolina. Out of state services delivered without prior approval will be denied unless there is retroactive Medicaid eligibility.



EPSDT OPERATIONAL PRINCIPLES CON'T.

➤ Durable medical equipment (DME), assistive technology, orthotics, prosthetics, or other service requested do **NOT** have to be included on DMA's approved lists or be covered under a CAP waiver program in order to be covered under EPSDT subject to meeting the criteria specified in this policy.



EPSDT OPERATIONAL PRINCIPLES CON'T.

- ➤ The prohibition in CAP/C on skilled nursing for purposes of monitoring does not apply to EPSDT services if skilled monitoring is medically necessary. (Example: NDN)
- ➤ Case management is an EPSDT service and must be provided to a child with a Medicaid card if medically necessary to correct or ameliorate regardless of eligibility for a CAP waiver.

EPSDT COVERAGE AND CAP WAIVERS

CAP Waiver services are available only to participants in the CAP waiver programs and are not a part of the EPSDT benefit unless the waiver service is ALSO an EPSDT service.

Additionally, a child financially eligible for Medicaid outside of the waiver is entitled to elect EPSDT services without any monetary cap instead of waiver services.

EPSDT COVERAGE AND CAP WAIVERS CON'T.

➤ ANY child enrolled in a CAP program can receive **BOTH** waiver services and EPSDT services. However, the cost of the recipient's care must not exceed the waiver cost limit.



➤If enrolled in the Community Alternatives
Program for Persons with Mental Retardation
and Developmental Disabilities (CAP-MRDD),
prior approval to exceed \$100,000 per year must
be obtained.

EPSDT COVERAGE AND CAP WAIVERS CON'T.

A recipient under 21 years of age on a waiting list for CAP services is eligible for necessary EPSDT services without any waiting list being imposed.



➤ EPSDT services must be provided to recipients under 21 years of age in a CAP program under the same standards as other children receiving Medicaid services and may be provided in the school setting, including to CAP-MRDD recipients.

EPSDT COVERAGE AND MH/DD/SA SERVICES

Staff employed by local management entities (LMEs) **CANNOT** deny requests for services, formally or informally. Requests must be forwarded to ValueOptions or other appropriate DMA vendors if supported by a licensed cliritian.

EPSDT COVERAGE AND MH/DD/SA SERVICES CON'T.

➤ LMEs may NOT use the Screening, Triage, and Referral (STR) process or the DD eligibility process as a means of denying access to Medicaid services. Even if the LME STR screener does not believe the child needs enhanced services, the family must be referred to an appropriate Medicaid provider to perform a clinical evaluation of the child for any medically necessary service. Only DMA and its contractors can determine if a Medicaid recipient meets criteria for a covered Medicaid service.

EPSDT COVERAGE AND MH/DD/SA SERVICES CON'T.

Requests for prior approval of MH/DD/SA services for recipients under 21 must be sent to Value Options or to an LME if handling PA in their catchment area.

EPSDT COVERAGE AND MH/DD/SA SERVICES CON'T.

If a recipient under 21 years of age has a developmental disability diagnosis, this does not necessarily mean that the requested service is habilitative and may not be covered under EPSDT. The EPSDT criteria of whether the service is medically necessary to correct or ameliorate a defect, physical or mental illness, or condition [health problem] apply. Examples include dual diagnoses and behavioral disorders. All individual facts must be considered.



REQUESTING PA FOR A COVERED STATE MEDICAID PLAN SERVICE

Covered state Medicaid plan services are defined as requests for services, products, or procedures covered by the North Carolina State Medicaid Plan.

➤ EPSDT does **NOT** eliminate the need for prior approval if prior approval is required.



REQUESTING PA FOR A COVERED STATE MEDICAID PLAN SERVICE CON'T.

➤ Requests for EPSDT services do **NOT** have to be labeled as such. Any proper request for services for a recipient under 21 years of age is a request for EPSDT services. When state staff or vendors review a covered state Medicaid plan services request for PA or continuing authorization (UR) for an individual under 21 years of age, the reviewer will apply the EPSDT criteria. For recipients under 21 years of age enrolled in a CAP waiver, a request for services must be considered under EPSDT as well as under the waiver if that service is both a CAP and a waiver service.

REQUESTING PA FOR A **COVERED STATE MEDICAID** PLAN SERVICE CON'T.

>EPSDT requests for prior approval for services must be fully documented to show medical necessity. This requires current information from the recipient's physician, other licensed clinicians, the requesting qualified provider, and family members or legal representative. If this information is not provided, Medicaid or its vendor will have to obtain the needed information, and this will delay the prior approval decision.



REQUESTING PA FOR A COVERED STATE MEDICAID PLAN SERVICE CON'T.

➤ If the recipient does not meet the clinical coverage criteria or needs to exceed clinical coverage policy limits, submit documentation with the prior approval request that shows how the service at the requested frequency and amount is medically necessary to correct or ameliorate a defect, physical or mental illness, or condition [health problem].

➤ Additionally, all other EPSDT criteria must be met.



REQUESTING PA FOR A COVERED STATE MEDICAID PLAN SERVICE CON'T.

➤ It is not sufficient to cover a standard, lower cost service instead of a requested specialized service if the lower cost service is not equally effective in that individual case.



SERVICES FORMALLY COVERED BY CSHS

Cochlear Implant and Accessories

Fax all requests for external parts replacement and repair, in letter format, to the appropriate cochlear or auditory brainstem implant manufacturer. The manufacturer will process requests, obtain prior approval for external speech or sound processors, and file claims. Guidelines for the letter requesting external parts replacement or repair can be obtained from the implant manufacturer.



SERVICES FORMALLY COVERED BY CSHS CON'T.

-Pediatric mobility systems,

including non-listed components,

should be sent to HP Enterprise Services using the Certificate of Medical Necessity/Prior Approval (CMN/PA form).

 Augmentative and Alternate Communication **Devices** should be sent to HP Enterprise Services.

SERVICES FORMALLY COVERED BY CSHS CON'T.

Oral Nutrition

Metabolic formula requests should be sent to DPH.

All other requests for formula that appear on the DMA fee schedules should be sent to HP Enterprise Services.

Formula that does not appear on the DMA fee schedules should be sent as an EPSDT request to:

Assistant Director Clinical Policy and Programs



INAPPROPRIATE PA REQUESTS RECEIVED BY VENDORS

➤ Vendors (CCME, HP Enterprise Services, ACS Pharmacy, MedSolutions, and ValueOptions, PBH, LMEs) may receive service requests for which the vendor is not responsible for conducting the prior approval reviews. As vendors can only authorize specific services in accordance with DMA-vendor contracts, those requests will be forwarded to the appropriate vendor for review.

REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES

➤ Requests for non-covered state Medicaid plan services are requests for services, products, or procedures that are not included at all in the North Carolina State Medicaid Plan **but coverable** under federal Medicaid law, 1905(r) of the Social Security Act for recipients under 21 years of age.



REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES CON'T.

Over-the-counter (OTC) Medications

If the OTC has a National Drug Code (NDC) number and the manufacturer has a valid rebate agreement with the Centers for Medicare and Medicaid Services (CMS) but the drug does not appear on DMA's approved coverage listing of OTC medications, send the request to the Assistant Director, Clinical Policy and Programs, Division of Medical Assistance.

REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES CON'T.

➤ Requests for Medicaid prior approval of DME, orthotics and prosthetics, and home health supplies that do not appear on DMA's lists of covered equipment should be submitted to the Assistant Director, DMA.



REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES CON'T.

Oral Nutrition

Formula that does not appear on the DMA fee schedules should be sent as an EPSDT request to:

Assistant Director Clinical Policy and Programs



REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES CON'T.

Effective with date of request September 1, 2008, Children's Special Health Services no longer authorizes payment for ramps, tie downs, car seats, and vests.

These items are not included in the durable medical equipment covered by Medicaid, nor are they covered under Early Periodic Screening, Diagnostic, and Treatment services, which cover medical equipment and supplies suitable for use in the home for Medicaid recipients under the age of 21. However, if the recipient is covered under a Medicaid waiver, these items may be considered.



REQUESTING PA FOR NON-COVERED STATE MEDICAID PLAN SERVICES CON'T.

➤ Requests for non-covered state Medicaid plan services and requests for a review when there is no established review process for a requested service should be submitted to:

Assistant Director for Clinical Policy

and Programs

Division of Medical Assistance

2501 Mail Service Center

Raleigh, NC 27699-2501

FAX: 919-715-7679



DOCUMENTATION REQUIREMENTS

Documentation for either covered or non-covered state Medicaid plan services should show how the service will correct or ameliorate a defect, physical or mental illness, or a condition [health problem].

This includes:

- documentation showing that policy criteria are met;
- documentation to support that all EPSDT criteria are met;
- evidence-based literature to support the request, if available.

Should additional information be required, the provider will be contacted.

DOCUMENTATION REQUIREMENTS CON'T.

➤ Requests for non-covered state Medicaid plan services may be submitted on the Non-Covered State Medicaid Plan Services Request form for Children under 21 Years of Age.

This form is located on the DMA website:

http://www.ncdhhs.gov/dma/provider/forms.htm



DUE PROCESS PROCEDURES

➤ Requests for prior approval of covered and non-covered state Medicaid plan services are to be decided with reasonable promptness, usually within 15 business days. No request for services for a recipient under 21 years of age will be denied, formally or informally, until it is evaluated under EPSDT.



- ➤ If covered or non-covered services are denied, reduced, or terminated, written notice with appeal rights must be provided to the recipient and/or the authorized representative and copied to the provider.
- Such a denial can be appealed in the same manner as any Medicaid service denial, reduction, or termination.



➤ The Division's due process procedures fully apply and can be found on the provider page at http://www.ncdhhs.gov/dma/provider/index.htm



The following are **NOT** acceptable reasons for denial of coverage under EPSDT:

- "This is the responsibility of the school system."
- "Close supervision, redirection, safety monitoring, assistance with mobility and other ADL's, improving socialization and community involvement, and controlling behavior are not service goals covered under EPSDT."
- "The services would not correct or improve the child's diagnosis."

The following are **NOT** acceptable reasons for denial of coverage under EPSDT:

- "EPSDT criteria do not include monitoring a child's actions for an event which may occur."
- "EPSDT services are not long term or ongoing."
- "Teaching coping skills cannot be covered under EPSDT."

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EPSDT WEBSITES

► Basic Medicaid Billing Guide

http://www.ncdhhs.gov/dma/basicmed/

> Health Check Billing Guide

http://www.ncdhhs.gov/dma/healthcheck/index.htm

> EPSDT Provider Page

http://www.ncdhhs.gov/dma/provider/epsdtheal thcheck.htm



EPSDT PROVIDER WEBSITE

Search DHHS Search DMA DHHS Home | A-Z Site Map | Divisions | About Us | Contacts | En Español Medical Assistance DMA SERVICES FOR COUNTY STAFF STATISTICS AND REPORTS For Providers DHHS > DMA > Medicaid Providers > EPSDT and Health Check DMA HOME **EPSDT** and Health Check Medicaid Providers A-Z Provider Topics **EPSDT** Calendars Early and Periodic Screening, Diagnosis and Treatment (EPSDT) is the federal law Claims that says Medicaid must provide all medically necessary health care services to Community Care (CCNC/CA) Medicaid-eligible children. The services are required even if the services are not Contacts for Providers normally covered by children's Medicaid, More EPDST Information Enrollment EPSDT and Health Check **Health Check** Fee Schedules/Cost Reports Forms any health problem found during a screening. More Health Check Information Fraud and Abuse HIPAA **EPSDT** and Health Check Quick Links

Consumers

EPSDT and

Health Check

Information for

NC Division of

The Health Check program facilitates regular preventive medical care and the diagnosis and treatment of

- EPSDT Policy Instructions (updated November 24, 2008)
- Health Check Billing Guide, April 2009
- Health Check Coordinator Directory

Library (bulletins, policies)

National Provider Identifier

Programs and Services

ABOUT DMA

 Non-Covered State Medicaid Plan Services Request Form for Recipients under 21 Years of Age (updated January 2009)

Q&A

