SUPERVISING PHYSICIAN: HERO OF MEDICARE COVERAGE AND REIMBURSEMENT

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GENERAL SUPERVISION

- Overall direction and control
- Physical presence not required
- Personnel training
- Equipment maintenance
DIRECT SUPERVISION

- Physical presence in office suite required
- Immediately available
- “Direct personal supervision”
PERSONAL SUPERVISION

• Physical presence in room required
Office Suite

- Same Floor
- Same Building
- On-Campus
IMMEDIATELY AVAILABLE

- Geographic distance
- Audio distance (shouting)
- Mental distance (preoccupation)
- Number of Services or Personnel
- Supervising Physician Awareness
SOURCES

• Regulations
• National or Local Coverage Determinations
• Medicare Manuals
• Medicare Physician Fee Schedule Database
MPFS Codes

- 1 = Procedure must be performed under the general supervision of a physician.
- 2 = Procedure must be performed under the direct supervision of a physician.
- 3 = Procedure must be performed under the personal supervision of a physician.
- 4 = Physician supervision policy does not apply when procedure personally furnished by a qualified, independent psychologist or a clinical psychologist; otherwise must be performed under the general supervision of a physician.
- 5 = Physician supervision policy does not apply when procedure personally furnished by a qualified audiologist; otherwise must be performed under the general supervision of a physician.
- 6 = Procedure must be personally performed by a physician OR a physical therapist who is certified by the American Board of Physical Therapy Specialties (ABPTS) as a qualified electrophysiologic clinical specialist and is permitted to provide the service under State law.
MPFS Codes

- **a** = All level of supervision standards for the lead number ("6" or "7") apply; in addition the PT with ABPTS certification may personally supervise another PT but only the PT with ABPTS certification may bill.
- **66** = May be performed only by PTs with ABPTS certification and certification in this specific procedure, or performed personally by the physician.
- **77** = PT with ABPTS certification (TC & PC), or direct supervision of physician (TC & PC), or technician with certification and general supervision of physician (TC only; PC physician) procedure.
- **22** = May be performed by a technician with on-line real-time contact with physician
- **21** = Procedure may be performed by technician with certification and under general supervision of a physician; otherwise under direct supervision of physician. (TC only; PC always physician).
- **9** = N/A
INCIDENT-TO

• Direct supervision
• Chemotherapy
• Infusion centers
• Cardiac rehabilitation
• Homebound patient exception
• Office in nursing home
Diagnostic Tests

- Supervision level varies with test
- Not required if performed by Medicare non-physician practitioner
- Supervising physician qualification
INDEPENDENT DIAGNOSTIC TESTING FACILITY

- Supervision level varies with test
- Fixed or mobile
- Technician qualification
- No more than 3 IDTFs
PORTABLE X-RAY SUPPLIER

• General
• vs. Mobile IDTF
Radiation Therapy

- Direct
- Hospital vs. Freestanding
NPP

- State licensure requirements
- Direct not required unless incident-to
- Certified Registered Nurse Anesthetist - 4
- Physician Assistant - General
- Nurse Practitioner - Collaboration
- Clinical Nurse Specialist - Collaboration
- Certified Nurse Midwife
- Clinical Psychologist
- Clinical Social Worker
- Physical or Occupational Therapist
- Audiologist
MEDICAL RESIDENTS

- Critical or key portion
- Unless otherwise specified by CMS
- Primary care exception
- No more than 4 residents
Hospital Outpatient Department

• Main building
• On campus
• Off campus
• Provider-based setting
HOSPITAL OUTPATIENT DEPARTMENT

- Diagnostic tests
- Supervising physician must be clinically able
- Direct supervision requires immediate availability, not physical presence
- Except direct supervision means office suite for non-hospital setting performing tests under arrangement
HOSPITAL OUTPATIENT DEPARTMENT

- Incident-to or therapeutic services
- Supervising non-physician practitioner permitted
- Supervisor must be clinically able
- General supervision permitted for list of services
- Direct supervision requires immediate availability, not physical presence
Common Mistakes

• Lack of documentation
• Inadequate level
• Absent physician
• Non-compliance especially with LCDs
• Inaccurate claims (identify of supervising practitioner)
CHECKLIST

• Internal policies and procedures, standard operating procedures
• Review especially LCDs
• Daily log
• Supervising practitioner schedules
• Confirm entries on claims (identify of supervising practitioner)
QUESTIONS?

Thank You!