IMPORTANT NOTE ABOUT THIS REIMBURSEMENT POLICY
You are responsible for submission of accurate claims. This reimbursement policy is intended to ensure that you are reimbursed based on the code or codes that correctly describe the health care services provided. UnitedHealthcare Community Plan reimbursement policies uses Current Procedural Terminology (CPT®), Centers for Medicare and Medicaid Services (CMS) or other coding guidelines. References to CPT or other sources are for definitional purposes only and do not imply any right to reimbursement.
This reimbursement policy applies to all health care services billed on CMS 1500 forms and, when specified, to those billed on UB04 forms. Coding methodology, industry-standard reimbursement logic, regulatory requirements, benefits design and other factors are considered in developing reimbursement policy.
This information is intended to serve only as a general reference resource regarding UnitedHealthcare Community Plan’s reimbursement policy for the services described and is not intended to address every aspect of a reimbursement situation. Accordingly, UnitedHealthcare Community Plan may use reasonable discretion in interpreting and applying this policy to health care services provided in a particular case. Further, the policy does not address all issues related to reimbursement for health care services provided to UnitedHealthcare Community Plan enrollees.
Other factors affecting reimbursement supplement, modify or, in some cases, supersede this policy. These factors include, but are not limited to: federal &/or state regulatory requirements, the physician or other provider contracts, the enrollee’s benefit coverage documents, and/or other reimbursement, medical or drug policies.
Finally, this policy may not be implemented exactly the same way on the different electronic claims processing systems used by UnitedHealthcare Community Plan due to programming or other constraints; however, UnitedHealthcare Community Plan strives to minimize these variations.
UnitedHealthcare Community Plan may modify this reimbursement policy at any time by publishing a new version of the policy on this Website. However, the information presented in this policy is accurate and current as of the date of publication.
UnitedHealthcare Community Plan uses a customized version of the Optum Claims Editing System known as iCES Clearinghouse to process claims in accordance with UnitedHealthcare Community Plan reimbursement policies.

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Application

This reimbursement policy applies to UnitedHealthcare Community Plan Medicaid and Medicare products.

This reimbursement policy applies to services reported using the 1500 Health Insurance Claim Form (a/k/a CMS-1500) or its electronic equivalent or its successor form. This policy applies to all products and all network and non-network physicians and other qualified health care professionals, including, but not limited to, non-network authorized and percent of charge contract physicians and other qualified health care professionals.

Payment Policies for Medicare & Retirement and Employer & Individual please use this link. Medicare & Retirement Policies are listed under Medicare Advantage Reimbursement Policies. Employer & Individual are listed under Reimbursement Policies-Commercial.

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Policy

Overview

This policy is intended to address Evaluation and Management (E/M) services are reported using Current Procedural Terminology (CPT®) codes 99201-99350. Each code contains three (3) “key” components: history, examination and medical decision making, which are used as a basis for selecting a level of E/M code that best describes the service rendered to the patient.

The E/M coding section of the CPT® book is divided into broad categories such as office/outpatient visits, inpatient hospital visits, consultations, etc. Many of these categories are further divided into two or more subcategories and are further classified into levels of E/M appropriate for that service type such as:

- Office visits - new and established patients
- Hospital E/M services - initial and subsequent; further based on the intensity of care provided (e.g., critical care or observation)
- Other E/M services - based on location, e.g., emergency department services

The classification is important because the nature of the work varies by type of service, place of service, the patient’s medical status, and other code criteria, along with the amount of provider work and documentation required.

CMS published E/M documentation guidelines in 1995 and 1997. These guidelines describe three key components of E/M services:

- history,
- examination, and
- medical decision making
These components appear in the descriptors for most basic E/M codes (office and other outpatient services, hospital observation services, hospital inpatient services, consultations, emergency department services, nursing facility services, domiciliary care services, and home services) and describe increasing levels of complexity.

The documentation of these three components (history, examination and medical decision making) depends on clinical judgment of the provider and the nature of the presenting problem(s). Each of these three components has different levels of complexity. The selection of the appropriate level of complexity and appropriate selection of the level of service must be reflected in the medical record documentation.

**Reimbursement Guidelines**

### All E/M Services

When assigning an E/M Level of Service for a patient Encounter, significant factors to consider are the nature of the presenting problem (NoPP) and the complexity of medical decision making (MDM).

The expectation of documentation necessary to substantiate the claim as billed will follow the general principles of medical record documentation which apply to all types of medical and surgical services in all settings. While E/M services vary in several ways, such as the nature and amount of physician work required, the following general principles help ensure that medical record documentation for all E/M services is appropriate:

- The medical record should be complete and legible;
- The documentation of each patient Encounter should include but not be limited to:
  - Reason for the Encounter and relevant history, physical examination findings, and prior diagnostic test results;
  - Assessment, clinical impression, or diagnosis;
  - Medical plan of care;
  - Date and legible identity of the observer;
  - If not documented, the rationale for ordering diagnostic and other ancillary services should be easily inferred;
  - Past and present diagnoses should be accessible to the treating and/or consulting physician;
  - Appropriate health risk factors should be identified;
  - The patient’s progress, response to and changes in treatment, and revision of diagnosis should be documented;
  - The diagnosis and treatment codes reported on the health insurance claim form or billing statement should be supported by documentation in the medical record.
  - Review of past medical records must include a summary of relevant information gleaned from this review in order to receive credit in the Amount and Complexity of Data section.

While there is no prohibition on the use of proprietary templates, documentation from either an electronic health record (EHR) or hard-copy that appears to be cloned (selected information from one source and replicated in another location by copy/paste methods) from another record, including but not limited to history of present illness (HPI), exam, and MDM, would not be acceptable documentation to support the claim as billed.

For example, HPI should be the provider’s individual description of the development of the patient’s present illness from the first sign and/or symptom, or from the previous Encounter to the present; the exam should be the individual description of the patient’s exam at the time of the Encounter and MDM should also be individualized to the Encounter for the patient to outline a specific assessment and plan of care.
- Medical record documentation should be provided upon request.

**E/M Services Performed in an Emergency Department (ER/ED) Place of Service**

CPT codes 99281-99285 are used to report E/M services rendered in an ER/ED place of service. Evaluating for level of care appropriateness for these codes in an ER/ED place of service includes a review of the tests and management options that are available to be performed during the initial visit.

The 1995 CMS Documentation Guidelines state that the number of diagnoses and management options that must be considered "...is based on the number and types of problems addressed during the Encounter, the complexity of establishing a diagnosis and the management decisions that are made by the physician." Additional Work-up Planned is an element of review which includes a number of diagnoses and management options. The Additional Work-up Planned element contributes to indicating the complexity of a patient based on the clinician's utilization of diagnostic tests. UnitedHealthcare utilizes the industry standard guidelines to determine the appropriate level of care is as follows:

<table>
<thead>
<tr>
<th>A. Number of Diagnoses and Management Options</th>
<th>PointsAssigned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-Limiting or minor Problems (stable, improved or worsening) Max of 2 points can be given</td>
<td>1</td>
</tr>
<tr>
<td>Established Problem – stable improved</td>
<td>1</td>
</tr>
<tr>
<td>Established Problem – Worsening</td>
<td>2</td>
</tr>
<tr>
<td>New Problem – No Additional Work-up Planned. Max of 1 point can be given</td>
<td>3</td>
</tr>
<tr>
<td>New Problem – Additional Work-up planned</td>
<td>4</td>
</tr>
</tbody>
</table>

A provider receives 3 points for “New Problem, No Additional Work-Up Planned,” and 4 points for “New Problem, Additional Work-Up Planned”. This one-point difference can affect whether a level 4 or level 5 code is appropriate. Please note that all Encounters with ED patients are considered “New Problem” Encounters for purposes of scoring.

An example of Additional Work-up Planned, is if the physician schedules testing him/herself or communicates directly with the patient’s primary physician or representative the need for testing which is to be done after discharge from the ED, and the appropriate documentation has been recorded. Credit for “Additional Work-up” Planned is granted (4 points assigned). Credit is not given for the work up if it occurs during the ER Encounter. This interpretation is consistent with the level 5 code description that “…Usually, the presenting problem(s) are of high severity and pose an immediate significant threat to life or physiologic function…” Patients admitted to the hospital under the care of a physician other than the ER physician may have testing done as part of the admitting physician’s care for that patient. The ER physician will not receive credit for the Additional Work-up Planned done under the care of the admitting physician.

### Definitions

<table>
<thead>
<tr>
<th>Definitions</th>
<th>Description</th>
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<tbody>
<tr>
<td>Additional Work-up Planned</td>
<td>Any testing/consultation/referral that is being done beyond that Encounter to assist the provider in medical decision making.</td>
</tr>
<tr>
<td>Encounter</td>
<td>Interaction between a covered member and a health care provider for which evaluation and management service or other service(s) are rendered and results in a claim submission</td>
</tr>
</tbody>
</table>
## Questions and Answers

1. **Q:** When a separate written report for diagnostic tests/studies is prepared by the same individual performing the E/M service, should this be considered as a factor in the E/M code selection?  
   **A:** No. Any specifically identifiable procedure reported separately from the E/M service should not be considered in the selection of E/M service level reported.

2. **Q:** Will UnitedHealthcare require medical records for all reported E/M services?  
   **A:** No. There may be occasions where UnitedHealthcare could request medical records to determine the appropriate level of E/M service has been reported.

## Attachments: Please right-click on the icon to open the file.

- Evaluation and Management Procedure Codes

## Resources

- Individual state Medicaid regulations, manuals & fee schedules
- Centers for Medicare and Medicaid Services, Healthcare Common Procedure Coding System, HCPCS Release and Code Sets
- The Office of Inspector General (OIG)

## History

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
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<tbody>
<tr>
<td>1/1/2017</td>
<td>Annual Policy Version Change</td>
</tr>
<tr>
<td>9/1/2016</td>
<td>Policy implemented by UnitedHealthcare Community &amp; State</td>
</tr>
<tr>
<td>4/21/2016</td>
<td>Policy approved by the Payment Policy Oversight Committee</td>
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