



COLLEGE of AMERICAN
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Practice Management Networking Community

MUEs and Other Denials to be Aware of

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November 9, 2021

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- **Member, Practice Management Committee**
- **Physician Executive Director, MedStar Medical Group- Pathology, MedStar Health**
 - **Previous roles include Hospital employment and Medical Directorship**
 - **Independent Contractor as employee of group, partner, and eventually President and Head of Group**
- **Board certified AP/CP**



Topic for Today's Discussion

- What are MUEs and Other Denials to be Aware of?
- What is the National Correct Coding Initiative?
- How practices stay up-to-date on MUEs and other payment limitations?

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Basic “Ground Rules”

- Respect for diversity of participants
- Respect for privacy of confidential/privileged information
 - Do not share sensitive information deemed confidential or that reflect specific competitive strategies, trade secrets, market positions, etc.

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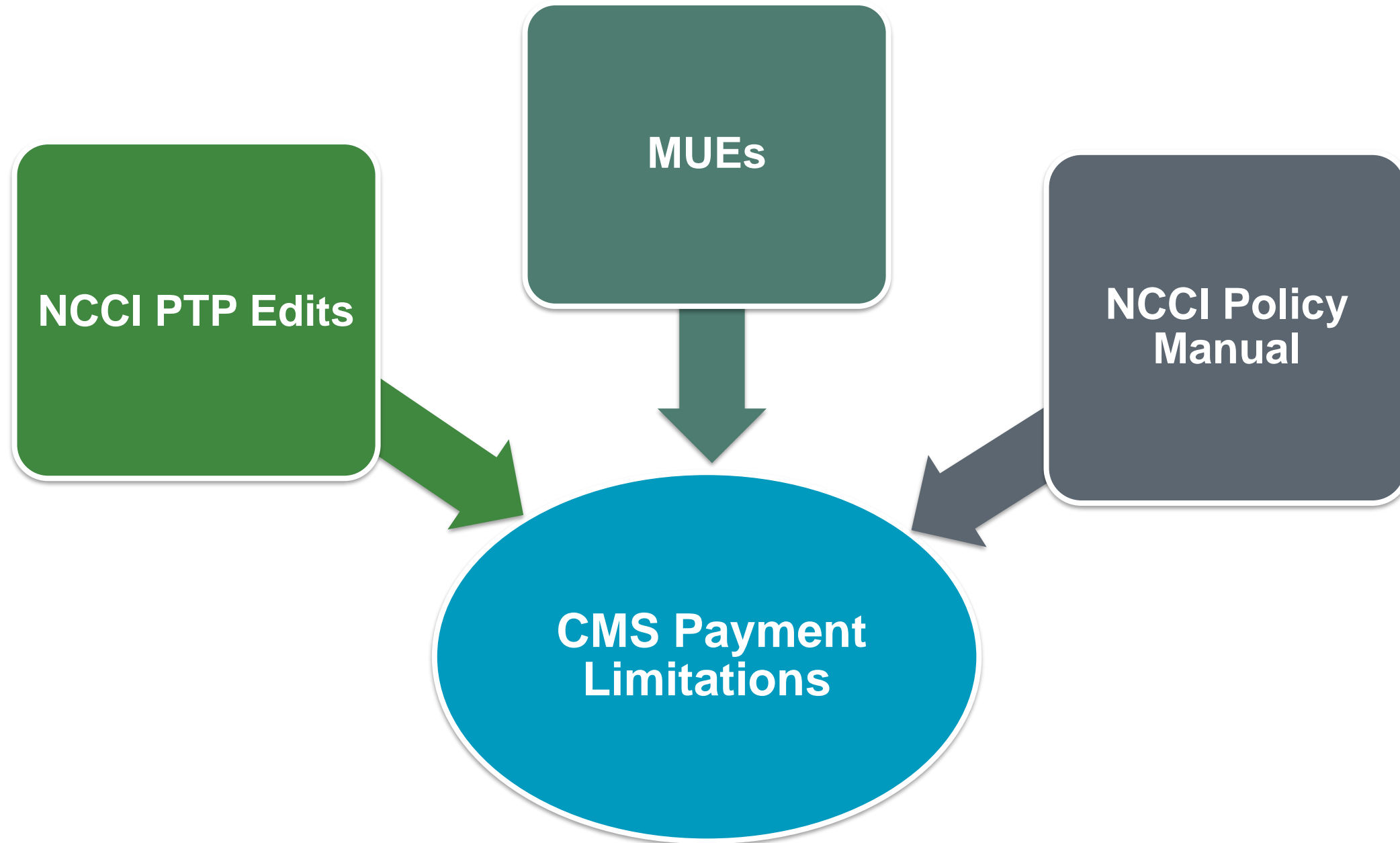
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Mark S. Synovec MD, FCAP

- **Advisor, Economic Affairs Committee**
- **Member, Council on Government and Professional Affairs**
- **Chair, AMA CPT Editorial Panel**
- **President, Topeka Pathology Group, LLC**
- **Board certified AP/CP**



CMS National Correct Coding Initiative (NCCI)



CMS National Correct Coding Initiative (NCCI)

- **CMS contracts with Capitol Bridge, LLC to propose and maintain a system of coding edits to be utilized nationally by all Medicare carriers.**
- CMS Website Listed: <https://www.cms.gov/Medicare/Coding/PTP-Coding-Edits>
 - Published MUEs
 - Column 1/Column 2 Procedure-To-Procedure (PTP) Edits
 - NCCI Policy Manual for Medicare Services

CMS National Correct Coding Initiative (NCCI)

- **NCCI Procedure-to-Procedure Edits**
 - Released on a quarterly basis
 - Oldest edit set in NCCI.
 - Code edit pairs and unit of service limitations set by CMS through NCCI
 - Example: 88112 (non-gyn Thinprep®) with 88108 (non-gyn Cytospin®)
 - CAP is allowed to confidentially review draft edits and provide feedback.
 - If published, NCCI PTP edits will appear on CMS website

CMS National Correct Coding Initiative (NCCI)

- **NCCI Policy Manual For Medicare Services**
 - Separate process which impacts payment for pathology and laboratory services.
 - Written in narrative form, sometimes explaining rationale for edits.
 - Chapter 10 is devoted entirely to Pathology & Laboratory Medicine services
 - November release anticipated following PFS Final Rule
 - CAP review prior to January 1 effective date

CMS National Correct Coding Initiative (NCCI)

- **Medically Unlikely Edits**

- Originally designed to “limit typographical errors and erroneous claims” (Medically *Unbelievable* Edits)
- Limit units of same service per beneficiary/DoS/MD
- Initiated 1-1-07, released q 2-3 months with 6 weeks for comment
- MAC checks each claim against the MUE on one line* with denial of full claim if MUE exceeded--Instructed to correct “typographical error and resubmit”
- Modifier -59 may allow claims to appear on separate lines and bypass edits*
- CAP is allowed to confidentially review draft edits and provide feedback.
- If published, will appear with NCCI PTP edits on CMS website

Example Published MUEs for Pathology

CPT Code	Description (abbrev.)	Practitioner MUEs
88108	Cytopathology, concentration technique, smears & interpretation	6
88112	Cytopathology, cellular enhancement technique	6
88331	Frozen Section	11
88332	Frozen Section addl tissue bl.	13
88342	Immhist/cyto, per spec; initial single ab proced	3
88341	Immhist/cyto, per spec; each addl single ab proced	13

- ❖ Not all are published.
- ❖ Previously adjudicated per line of the claim form (modifiers are on a separate line).
- ❖ Now (by CMS Program Integrity) some may be adjudicated by date of service. “MUE adjudication indicators—MAI”

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Resources

- **CAP Practice Management Resources**
 - Resources: <https://www.cap.org/member-resources/practice-management>
- **CAP Value-Based Business Toolkits**
 - Information: <https://www.cap.org/member-resources/practice-management/value-based-business-toolkits>
- **CAP Advocacy and Economic Affairs Resources**
 - Resources: <https://www.cap.org/advocacy/payments-for-pathology-services/medicare-physician-fee-schedule>
- **CMS NCCI MUE Program**
 - Resources: <https://www.cms.gov/Medicare/Coding/NationalCorrectCodInitEd/MUE>

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Next steps

- Next session
 - Implementing Digital Pathology in a Pathology Practice, December 14, 2021 – 2nd Tuesday of the month
- Two requests
 - Please complete survey
 - Consider volunteering to lead a future session and share your experience



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