

NON-FACE-TO-FACE VISIT (NF2F) CMS BILLING UPDATES

UHealth Department of Pediatrics Guidelines

Updated 4/8/2020

#1 - NF2F: WHOSE TIME COUNTS?

New information from UMB:

- *Time spent performing NF2F work can be the time of the attending AND / OR a qualified health care professional (i.e. APP).*
- MAs or RNs do not qualify as qualified health care providers (QHCPs) for NF2F work. Their work needs to be captured in Comprehensive Care Management codes.
- **Advanced Practice Providers (APPs):**
 - Directions are for APPs working in **SOS11** (working "incident to"). If you are interested in SOS22 info for APPs, email me separately.
 - **APP enrolled w/ 3rd party payors:** APP work and time counts! Bill under APP name, does not require attending involvement.
 - **APP NOT enrolled w/ 3rd party payors:** Work completed by APP - note forwarded to attending to finalize - bill under the attending name - time for APP + attending is added together = Total Time Spent
 - Dept of Peds must be incurring at least part of the APP cost
 - (UofU employee or leaseback) to count APP's time
 - **Time Spent** can be all APP time, all attending time, or any combination of APP + attending time
 - **APP + attending:** each documents the work they did and the time they spent - APP forwards the note to the attending to add their part and finalize – coders will add APP+ attending = Total Time. Each should document the work they completed and the time they spent.
- **Fellows:**
 - Fellows may contribute to the work and documentation, but ONLY THE ATTENDING TIME IS COUNTED (due to teaching / GME requirements)
 - Fellows can participate in the work and queue up the documentation – but attending must finalize and include only the total time spent by the attending

#2 - NF2F: WHAT HAPPENS WHEN THE TIME SPENT IS <31 MINUTES?

- *Time spent does NOT need to meet 31-minute threshold to be counted for billing!*
- Telephone encounters of ANY DURATION that involve decision making by the attending or APP should be documented in an NF2F note
- In addition to traditional NF2F CPT 99358, new opportunities for reimbursing shorter phone calls w/ new code set: CPT 99441 – 443:
 - Telephone evaluation
 - Time of attending or APP spent on the phone
 - Established patient
 - Does *not* need to be linked to a previous or upcoming E&M – do document established patient relationship
 - 99441: 5-10 min – 0.25 wRVUs - \$60.93
 - 99442: 11-20 min – 0.5 wRVUs - \$still checking\$
 - 99443: 21 – 30 min – 0.75 wRVUs - \$100.38

DEPARTMENT OF PEDIATRICS RECOMMENDATIONS

- *All NF2F encounters should be documented using the Non Face to Face Note Type in iCentra ([Documenting Non-Face-to-Face & Curbside Consults iCentra Tipsheet](#))*
 - All NF2F workflow processes remain the same, except as noted above for APP participation
 - Document time spent by attending and/or APP – no matter how long the encounter
 - All notes are finalized
 - Coders will assign the most appropriate code