

Dermatology Coding Alert

Reader Questions: Make Sure You Meet Incident-To Criteria

Question: We have a new physician assistant in our office who sees patients for the dermatologist. Can I bill his services as incident-to, and what requirements must we meet in order to do so?

South Carolina Subscriber

Answer: As long as the physician assistant's services meet a few guidelines, you should be able to report his services as incident-to services. Make sure you meet the following criteria:

- The PA is enrolled in Medicare with a valid PIN and has a state license.
- The patient is not new or undergoing a status change and has initially been seen by the physician who has established a plan of treatment that will be followed by the PA.
- The dermatologist is in the office suite and immediately available for assistance, consultation or patient emergencies.

As long as you can show that each of these items is true, your PA can provide the service and you can report the services under the dermatologist's name and provider identification number (PIN) when filing with Medicare.

Tip: Most ancillary staff can provide incident-to services on behalf of an in-office, supervising physician. This could be a PA, medical assistant, registered nurse, certified nursing specialist, or nurse practitioner, among others.

Typically, MAs and nurses will provide educational services and administer injections and level-one E/M services, while PAs and CNSs perform more extensive services such as higher-level E/M visits or minor in-office procedures.

Benefit: When a nonphysician practitioner uses the dermatologist's PIN to file the claim, Medicare will reimburse fully for the code. If the NPP uses his own PIN, Medicare pays only 85 percent of the code value.

Caution: Never report services rendered in a hospital setting -- either outpatient, inpatient or in the emergency department -- as incident-to. Medicare doesn't allow it. Also, if the physician doesn't see the patient and it is a new patient or new consultation, or the patient brings up a new problem that is not part of the plan from the physician, you must report it under the provider number for the NPP.