

Dermatology Coding Alert

READER QUESTIONS: Zoom In on Supervision Requirements

Question: If an NP or PA were to perform a diagnostic test, as long as it was within his scope of practice, am I correct that there are no supervision requirements?

Maine Subscriber

Answer: Nurse practitioners (NPs), clinical nurse specialists (CNSs) and physician assistants (PAs) may not function as supervisory physicians under the diagnostic tests benefit, according to Medicare rules.

Example: If your physician is out of the office, your NP cannot supervise fluorescein angiography (includes multiframe imaging) with interpretation and report (92235).

Beware: Keep in mind that the supervision requirements for nonphysician ancillary personnel performing diagnostic tests are different from those for incident-to services. Diagnostic testing requires general supervision, while incident-to services require direct supervision.

But when these practitioners personally perform diagnostic tests as listed in the Balanced Budget of Act of 1997, the supervision rules do not apply. An NP or PA may perform diagnostic tests as long as he follows the state scope-of-practice laws and the applicable state requirements for physician supervision or collaboration.