

Internal Medicine Coding Alert

Reader Question: Discharge of Dead Patients

Question: The local nursing home sent me notification to go there and complete charts on two patients who died there in the last six to 10 months. Is this a billable service?

Michigan Subscriber

Answer: If you have not completed discharge summaries on the patients, then this may be billable using the nursing facility discharge services codes 99315-99316. The CPT description notes that these codes are used to report "the total duration of time spent by a physician for the final nursing facility discharge of a patient."

In the July issue of Internal Medicine Coding Alert, we stated that the physician must have pronounced the patient dead or actively participated in some way in the patient's care (providing face-to-face service) on the date of death to use these discharge codes. However, the American Medical Directors Association has received a recent letter from CMS stating that a face-to-face encounter is NOT required to bill the nursing home discharge codes and confirming that the discharge codes can be billed when a patient dies in the facility. The letter also notes that local carriers may have policies further defining the discharge service.

So, there's no question that the nursing home discharge codes could be used for the patients described in the question, who had died in the nursing home. The issue is the length of time that has passed since their deaths. Six to 10 months is much longer than normally would be expected. Whether it has been too long will depend on the local carrier and whether it has rules about timely filing. In this situation, your best step is to ask the carrier before filing if there is such a deadline.