

Internal Medicine Coding Alert

Reader Question: Verify MD/NP Collaboration Agreement Before Locum Tenens Time Starts

Question: One of the physicians in our practice will be traveling for two months and has made locum tenens arrangements with another doctor to cover while he is away. My question is, the traveling physician works with a nurse practitioner who bills incident-to under his NPI. How should we bill the NP's incident-to service while he is away?

Pennsylvania Subscriber

Answer: You may be able to continue to bill incident to using the traveling physician's National Provider Identifier (NPI).

The supervising physician doesn't have to be the physician associated with a patient's care plan. Any physician can supervise, as long as the nurse practitioner (NP) is acting as an extension of the plan created by a physician. The fact that the supervising physician is a locum tenens physician does not directly affect the practice's ability to bill the NP's services as "incident to."

You should verify any MD/NP collaboration agreement as well as the State Board of Nursing regulations for your state regarding the collaborating physician substitute to ensure your practice is aware of all requirements. For instance, the practice should determine whether work during the physician's absence under the locum tenens's supervision will affect the collaboration agreement.

Example: The NP is providing incident-to services based on Dr. A's plan. Dr. B is the locum tenens physician during Dr. A's absence. File the claim with Dr. A's name and NPI, and append modifier Q6 (Service furnished by a locum tenens physician) to indicate a locum tenens physician was present instead of Dr. A. As long as all of the other incident to requirements are met, there should be no problem.

Pitfall: CMS has a 60-day time limit for using locum tenens physicians. Because you stated that your physician will be gone longer than that, an alternate option would be necessary after the 60-day mark.

Resources: You'll find additional locum tenens information in the Medicare Claims Processing Manual, Chapter 1, Section 30.2.11, at www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/clm104c01.pdf. For more information on "incident to" services, view Section 60 of Chapter 15 of the Medicare Benefit Policy Manual, at <http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>.