

## Internal Medicine Coding Alert

### Reader Questions: Draw Complete ROS Picture

Question: There are three review of system (ROS) levels: problem-pertinent, extended and complete. What are the differences among these three levels?

Nebraska Subscriber

Answer: Each ROS level is defined by the number of systems your physician checks during the patient encounter. Medicare defines these systems for documentation purposes:

- constitutional symptoms
- eyes
- ears, nose, mouth and throat
- cardiovascular
- respiratory
- gastrointestinal
- genitourinary
- musculoskeletal
- integumentary (skin and/or breasts)
- neurologic
- psychiatric
- endocrine
- hematologic/lymphatic
- allergic/immunologic.

Check out these ROS level definitions from the 1995 Documentation Guidelines for E/M Services:

A **problem-pertinent** ROS inquires about the system directly related to the problem(s) identified in the history of present illness (HPI). Documentation should include the patient's positive responses and pertinent negatives for the system related to the problem.

A problem-pertinent ROS can support up to a level-two new patient E/M (99202, Office or other outpatient visit for the E/M of a new patient, which requires these three key components: an expanded problem-focused history; an expanded problem-focused examination; straightforward medical decision-making ...) or a level-three established patient E/M (99213, Office or other outpatient visit for the E/M of an established patient, which requires at least two of these three key components: an expanded problem-focused history; an expanded problem-focused examination; medical decision-making of low complexity ...).

An **extended** ROS inquires about the system directly related to the problem(s) identified in the HPI and a limited number of additional systems. The internist should document the patient's positive responses and pertinent negatives for two to nine systems for this level.

An extended ROS can support up to a level-three new patient E/M (99203, ... a detailed history; a detailed examination; medical decision-making of low complexity ...) or a level-four established patient E/M (99214, ... a detailed history; a detailed examination; medical decision-making of moderate complexity ...)

A **complete** ROS inquires about the system(s) directly related to the problem(s) identified in the HPI plus all additional body systems. For this level, the internist must review at least 10 organ systems, and he must individually document those systems with positive or pertinent negative responses. "For the remaining systems, a notation indicating all other systems are negative is permissible," according to CMS' documentation guidelines.

