

Part B Insider (Multispecialty) Coding Alert

ENROLLMENT: Quell Confusion About CMS' 30-Day Retrospective Billing Rule

If your head continues to spin over the new 30-day rule, we've got clarification straight from Medicare.

Practices that are panicking over Medicare's 30-day retrospective billing regulation may find a reason to exhale with a new Medicare clarification.

Effective this year, you'll be able to retroactively bill Medicare for services your physician rendered up to 30 days prior to the date of filing a Medicare enrollment application that a Medicare contractor subsequently approves.

As we reported in the Insider (Vol. 10, No. 2), **Jim Bossenmeyer** of CMS' office of financial management said during a Jan. 13 CMS open door forum that the effective date of billing is the later of either the date of filing or the date the physician first starts to practice at the location.

But several subscribers wrote in to the Insider asking for further information on this new directive. For instance, **Sylvia Cohn** of Hill Medical Coding in Pittsburgh wrote, "After I read about the change to 30-day retrospective billing, I called my carrier and they said they are not implementing that rule. Why is that?"

We went straight to the source and got the following information from a Medicare spokesperson:

"We have placed the following FAQ on the CMS Web site," Medicare's rep told the Insider:

Question: What is the effective date of the enrollment provisions found in the CY 2009 Physician Fee Schedule (CMS-1403-FC)?

Answer: The effective date for provisions found in the CY 2009 Physician Fee Schedule is January 1, 2009 unless otherwise specified. Since CMS did not establish a delayed effective date for any changes in the Medicare provider enrollment provisions, the effective date of the enrollment provisions is also January 1, 2009.

CMS is in the process of developing instructions for Medicare contractors regarding these new provisions ... CMS intends to phase in their enforcement of this provision and will begin actively monitoring provider compliance with this provision beginning on April 1, 2009."