

Part B Insider (Multispecialty) Coding Alert

Incident-To Billing: Can You Prove Where Your Doc Was Two Year Ago Today?

Some carriers require physician signature on incident-to claims

If your doctor is supposed to be supervising a non-physician practitioner, he can't be off playing golf or catching a movie - no matter how multitalented he is.

If your carrier audits today's incident-to claims a year or two from now, the auditors will do their utmost to find instances when your physician wasn't really on the premises supervising an NPP. For example, if they can find records showing that the physician was at the hospital during that time, they can knock down a whole day's incident-to claims, says **Theresa Powers**, a consultant with **Doctors Management** in Knoxville, TN.

Each carrier has its own guidelines on how to demonstrate that the physician was in the office suite during an incident-to service. For example, **Trailblazer** requires that the physician personally sign off on all incident-to services, says **Jean Acevedo** with **Acevedo Consulting** in Delray Beach, FL.

But **Cigna** doesn't require a signature, and in fact, many carriers don't require any positive proof that a doctor was on-site, says Powers. However, if the doctor was on vacation in Tahiti during a particular incident-to visit, the carrier will probably find out.

Acevedo had one client who had to turn over all of his personal calendars to verify that he was in the office suite when he claimed to have been supervising an NPP. "To say it was a nightmare is an understatement," she recalls.

Some physician offices automatically throw away old schedules and calendars when they close out billing at the end of each year, notes Acevedo. And some practice management software will automatically erase the details of all the appointments at year's end. When this happens, the only proof that a doctor was in the office may be her personal office calendar showing dates when she was away.

Idea: One way to preserve scheduling info and prove that a doctor was able to supervise an NPP on a particular date is to have the billing department batch all information together on each day. If the billing department staples a copy of the day's schedule onto each batch of superbills, you can easily retrieve that information when the need arises, says Acevedo.

There are all sorts of reasons to keep scheduling details indefinitely, says **Kathy Pride**, applications specialist with San Rafael, CA-based **QuadraMed**. For one thing, you never know when a patient will file a frivolous lawsuit and try to claim that a physician wasn't there on a particular date when an NPP treated him. Save sign-in sheets that prove a physician came in on a particular day, she urges. And if your software erases scheduling info at the end of the year, ask your vendor to create a backup.