

Part B Insider (Multispecialty) Coding Alert

OIG Adds Consults to Injury

3 Easy Ways to Avoid Trouble

If your doctor regularly receives patients from another physician, you'd better make sure both of them are writing down the right words to pass muster as a consult.

The HHS Office of Inspector General listed consults as one of its hot-button issues for 2003, and physician offices are freaking out. But even before the OIG noticed this issue, many offices had a problem with billing for consults, says **Mary I. Falbo**, president of Millennium Healthcare Consulting Inc. in Lansdale, Pa. "It's getting more attention because it's on the OIG radar screen."

There was a dramatic increase in billings for consults after CMS loosened the rules for billing them a few years ago, says attorney **William Sarraille** with Arent Fox Kintner Plotkin & Kahn in New York.

Auditors have always looked at this issue, says **Marcella Bucknam**, HIM coordinator with Clarkson College in Omaha, Neb. "They want to see documentation that there really was a request for information and not just a referral." This can be a pretty subtle distinction, but it can add up to a huge difference in reimbursement.

For a bona-fide consultation, the referring physician must always include a question, such as "What would you recommend?" or "Do you agree with this patient's care plan?" Bucknam says.

"The most fundamental issue is whether these are consultation services or [E/M services](#)," Sarraille says. The difference between the two is "ultimately dependent on the subjective intent of the requesting physicians." If your office receives a patient from another office, ask explicitly if this is a consultation, he says. Ask the referring physician if she's looking for advice and opinions, or wants your physician to take over management of the patient.

"Some offices will actually send over a confirmatory fax saying, 'You requested our opinion on this patient. If this is correct, please place this in your files as a confirmatory document,' " Sarraille says.