

## Part B Insider (Multispecialty) Coding Alert

### Part B Billing: Don't Let Locum Tenens Rules Spoil Your Summer Vacation

**LT restrictions made easy with these tips for filling physician vacancies.**

The onset of warm breezes and sunny skies can only mean that summer is fast approaching. As much needed vacations from the toil and trouble of everyday life are planned, it's often necessary for practices to engage locum tenens (LT) physicians to provide coverage for doctors away on holiday.

**Quick Review:** "Locum tenens" (LT) refers specifically to physicians who substitute for other physicians when they're absent for the following reasons: illness, pregnancy, vacation, continuing medical education, and sabbatical.

"Locum tenens do not generally participate in the Medicare program, often moving to wherever they're needed," said a Noridian Medicare representative during the MAC's May 31 webinar entitled "Reciprocal Billing and Locum Tenens Arrangements."

Securing an LT to fill in for an absent physician can really lighten the load around the office, but make sure you're coding and hiring within the set LT parameters mandated by CMS.

#### Notes on the LT Substitution

**NPI:** It's wise to remember that a locum tenens is substituting for a regular physician and is not a temporary hire for a busy practice. LTs are not contractual employees. In fact, though they may have their own National Provider Identification (NPI) numbers, LTs services are always billed under the regular physician's NPI.

"You can mention the locum's NPI number in the records, but it is not a requirement. If you do, put the locum's NPI in block 19," said the Noridian MAC representative during the session. "Always bill with the absent, regular physician's NPI and make sure you reflect the locum in the documentation."

**60-day limitation:** The arrangement always notes that an LT cannot work for more than 60 continuous days for the physician she is covering. That time period can include weekends, and the locum tenens cannot skip days during that time and then continue after the agreed-upon 60 continuous days. The only exception to this rule is when the regular physician is called to active duty and then the locum tenens' time of service can be unlimited, explained the Noridian Medicare rep.

"A locum is allowed for 60 consecutive days for a physician," says the Noridian rep. "If the regular physician is part of a group with many doctors, the locum can come back and work for a different physician when his 60 days are up."

**MD or DO only:** There are medical restrictions when hiring locum tenens for your practice. CMS requires that the LT be an MD or DO, and there are no exceptions. "Non-physician practitioners cannot have locum during their absences," says the Noridian rep. In addition to medical specialists like cardiologists, urologists and others, an LT can also be utilized in the areas of general medicine, osteopathy, podiatry, dental surgery, optometry, and chiropractic services.

**Document to avoid audit:** It is essential that the documentation is comprehensive and detailed to avoid confusion about the services rendered by the LT. The beneficiary's care must be "within the authorized scope of the practice; a

medical necessity for the visit must be met; and documentation must clarify that the provider of service was the locum tenens, along with documenting the billing provider," Noridian Health Solutions said in its webinar presentation.

Billers don't need to mention the NPI of the LT or his name, but the medical records must be clear and mention the LT, the service provided, and his NPI.

### **Watch Your Modifiers**

It's critical to bill under the name and absent physician's NPI number to avoid denials. You need to append modifier Q6 (Service furnished by a locum tenens physician) to any code you're using to cover the LT's care. "This certifies to the MAC that you are following the locum rules when billing," said the Noridian rep.

**Honorable mention:** It's important to remember that an LT can be substituted for a "hospice patient's attending physician," but modifier GV (Attending physician not employed or paid under arrangement by the patient's hospice provider) must be attached to the code along with modifier Q6.

### **LT Quandaries**

Hiring a locum tenens doesn't need to be daunting and is actually a great benefit to practices and providers in need. Some of the guidelines, however, are a bit restrictive and confusing. Here are a few takeaways on the matter of locum tenens:

- There is no wiggle room on the 60 continuous days. The Noridian MAC recommends in instances where you might be out for a significant amount of days due to a sabbatical or in and out a couple days a week, you should contract a regular Medicare physician to cover for your absence.
- Locum tenens cannot be hired to cover for deceased regular physicians because when the provider passes away, his NPI and PTAN are deactivated. Locum tenens can only be used for living physicians.
- A locum tenens cannot be utilized for high volumes, overbooking, or practice expansions.

**Resource:** For a review of the Noridian Health Solutions materials on locum tenens and other billing issues affecting Medicare Part B, visit <https://med.noridianmedicare.com/web/jeb/enrollment/inquiries-and-solutions>.