

Part B Insider (Multispecialty) Coding Alert

Physician Note: CMS Allows TCM Code Reporting for Both New and Established Patients

You've got questions about the new transitional care management (TCM) codes 99495-99496? CMS finally has some answers, thanks to a new FAQ document on the subject, which fills in the holes that CPT® rules didn't cover. CMS's **Ryan Howe** alerted practices to the new information during the agency's March 12 Open Door Forum, noting several important points about the TCM codes that you'll have to keep in mind while billing, as follows:

- When determining which place of service (POS) code to use on your TCM claim, you should use the location that "required the face-to-face visit," CMS says in its March 12 document, *Frequently Asked Questions about Billing Medicare for Transitional Care Management Services*.
- The 30-day TCM period begins on the date of discharge and continues for the next 29 days. Your date of service should be the 30th day of care—not the first, Howe said during the CMS call.
- CMS will reject any claims with dates of service prior to Jan. 30, 2013, since the codes became effective on Jan. 1 and only cover 30-day periods.
- You can report TCM codes for both new and established patients, Howe said, which is a departure from CPT® rules. "CPT® guidance suggests that the codes are only for established patients, but for Medicare purposes, they can be reported for new patients as well," he said.
- If 30 days pass between discharge and the initial communication with the TCM practitioner, you cannot report TCM codes, Howe said during the call.
- Medicare will only pay the first TCM claim received per beneficiary in one 30-day period beginning on the date of discharge, so if more than one practitioner reports the code for the same patient, only the doctor whose claim is received first will get paid.
- If the patient dies before the 30th day of transitional care management, you cannot report the TCM codes, since they cover a full 30 days. Instead, you'd report the appropriate E/M code.

For more on the TCM codes, read the FAQs at www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeeSched/Downloads/FAQ-TCMS.pdf.