

Part B Insider (Multispecialty) Coding Alert

Physician Notes: OIG to Scrutinize E/M Coding Errors in 2011

Plus: Make sure you're using the 2011 ICD-9 codes

The OIG has once again set its sights on several new targets to go with the upcoming new year, and this time the feds will be double- and triple-checking your E/M documentation. On Oct. 1, the OIG published its 2011 Work Plan, which outlines the areas that the Office of Audit Services, Office of Evaluations and Inspections, Office of Investigations, Office of Counsel to the Inspector General, Office of Management and Policy, and Immediate Office of the Inspector General will address during the 2011 fiscal year. When the OIG targets an issue in its Work Plan, you can expect the agency to carefully review and audit sample claims of those services.

The Work Plan "describes the specific audits and evaluations that we have underway or plan to initiate in the year ahead considering our discretionary and statutorily mandated resources," the document indicates.

On the agenda for next year, the OIG has indicated that its investigators will "review the extent of potentially inappropriate payments for E/M services and the consistency of E/M medical review determinations." The OIG also plans to hone in on whether payments for E/M services performed during the global periods of other procedures were appropriate.

In addition, the OIG will scrutinize Medicare payments for Part B imaging services, outpatient physical therapy services, sleep testing, diagnostic tests, and claims with modifier GY on them (Item or service statutorily excluded, does not meet the definition of any Medicare benefit or, for non-Medicare insurers, it is not a contract benefit).

The OIG also intends to "review Medicare payments for observation services provided during outpatient visits in hospitals" to assess whether hospitals' use of observation services affects Medicare beneficiaries' care.

If you'd like to read the Work Plan in its entirety, visit the OIG Web site at www.oig.hhs.gov/publications/workplan/2011/FY11_WorkPlan-All.pdf.