

Part B Insider (Multispecialty) Coding Alert

Reader Question: Specialists' Non-Physician Practitioners Can Collect Primary Care Incentive Bonuses

Question: Our cardiology practice employs a non-physician practitioner (NPP) who performs a lot of E/M services for our patients, and that NPP received a bonus payment as part of the Primary Care Incentive Payment program, which surprised us. We wanted to double-check this -- is a nonphysician practitioner working for a specialist eligible to collect primary care incentive bonuses that are being distributed as a result of the Affordable Care Act rule?

Answer: Yes. As long as the NPP meets all of the criteria for the primary care incentive payments, he can collect the bonus, said CMS's **William Rogers, MD**, during a May 17 CMS open door forum.

"Under current law, that's permissible if you're a nonphysician practitioner, like a physician assistant or nurse practitioner, if you meet the criteria...then you would meet the requirements to receive the primary care incentive payment," Rogers said. "If there were to be any change to that program to preclude non-physician practitioners who work for specialists from receiving those payments, it would have to be through a change in law that Congress would have to make."

How to qualify: The Affordable Care Act defines a primary care practitioner using the following criteria:

- A physician with a primary specialty designation of family medicine, internal medicine, geriatric medicine, or pediatric medicine
- A nurse practitioner, clinical nurse specialist, or physician assistant for whom primary care services accounted for at least 60 percent of their allowable Part B charges during a prior period

Primary care services are defined as those coded with 99201-99215 (outpatient E/M services), 99304-99340 (nursing facility E/M services), or 99341-99350 (homebased E/M visits).

For more about the Primary Care Incentive Program, see CMS Transmittal 2161 at www.cms.gov/transmittals/downloads/R2161CP.pdf.