

Part B Insider (Multispecialty) Coding Alert

Reader Questions: Know Path Storage Rules

Question: Could you please explain the CMS date of service policy, especially the impact of 30 days or less for storage and 14 days following a patient's hospital discharge?

Answer: First, you should realize that the CMS date-of-service (DOS) rule applies to clinical lab tests and the facility technical component of anatomic pathology services/procedures. The policy does not apply to the professional component of anatomic pathology.

As a general rule, DOS is the date the specimen is obtained from the patient, with an exception that if the specimen has been stored more than 30 days, the DOS is the date the specimen is obtained from storage.

The following two rules apply only to procedures on specimens obtained from hospital inpatients or outpatients and stored 30 days or fewer (for non-hospital patients, just abide by the general rule.)

1. If the physician orders a test on a stored specimen on the first through thirteenth day after a hospital patient's discharge, use the date the specimen is obtained.
2. If the physician orders a test on a stored specimen on the fourteenth through thirtieth day after a hospital patient's discharge, use the date that you perform the procedure.

Caveat: Rules 1 and 2 apply when it is medically appropriate to collect the specimen during the hospital procedure (such as a biopsy), and the test results didn't guide treatment during the hospital stay.