

## Part B Insider (Multispecialty) Coding Alert

### Who Can Provide Chronic Care Management?

If you're wondering which of your practitioners can provide chronic care management (CCM) services, Marshall had answers to that during the forum.

"Physicians, nurse practitioners, physician assistants, clinical nurse specialists and certified nurse midwives subject to state licensure and scope of practice" can provide CCM, Marshall said. "Also, clinical staff can furnish the service incident to any of these physicians or practitioners subject to the incident to rule which of course applies, subject to the Physician Fee Schedule," she said.

CMS allows general supervision of clinical staff members when they do furnish these services, Marshall said. This means the physician must be providing overall direction but may be on-call and doesn't need to be on-site in the office. This exception applies because this is a non-face-to-face service, she said.

**Good news:** When a caller to the forum asked whether an RN's work performing chart documentation related to the chronic care management service could be counted toward the 20 minute monthly threshold, Marshall responded, "An RN is certainly clinical staff, and if they're doing chart documentation related to the CCM service, that could certainly be counted."

In addition, if clinical staff members are creating the electronic care record, you can count that time toward the 20 minutes for the monthly CCM service, she confirmed.

Although CCM will typically be performed by primary care practitioners, specialists could bill if they meet all of the requirements, Marshall said.

Keep in mind that the billing practitioner "must initiate the CCM service prior to furnishing or billing it, during a face-to-face visit (such as an annual wellness visit, initial preventive physical exam or comprehensive E/M visit) billed separately," Marshall added.