Eli's Rehab Report

Billing: Make Time to Target Untimed Codes on Your Part B Therapy Claims

Don't let the RACs bilk you out of this one example of appropriate billing.

RACs are already going after overbilling untimed therapy codes, so take a quick look to make sure your rehab organization isn't wide open for payment recoupments and related compliance woes.

Three out of four RACs have published untimed codes as an approved issue for automated review, warns **Nancy Beckley, MB, MBA, CHC,** a consultant with Bloomingdale Consulting Group Inc. in Brandon, Fla. Automated RAC reviews are ones "where the computer rolls away in the middle of the night and determines if a particular code has been billed in units of more than one."

In a nutshell: "An untimed code, according to the CPT code definition, is one billed irrespective of the time spent on the service," Beckley says.

In other words, if you don't see a time indicator, such as "15 minutes," "1 hour," etc. in the CPT code descriptor, you're looking at an untimed code.

Potential problem: "The therapy documentation may include the number of minutes," says **Victor Kintz,MBA, CHC, LNHA, RACCT, CCA,** managing director of operations for The Polaris Group based in Tampa, Fla. "But a biller who isn't familiar with the codes may bill for four units or an hour for an [untimed code]. And if the MAC or FI system pays it by mistake, then there's an overpayment," Kintz cautions.

So therapists in facility settings, especially, should alert their billers to this potential snag.

Know These Untimed Code Hot Buttons

Ouch: In the RAC demo alone, RACs recovered $3.2 million on the issue of speech therapy untimed codes, noted **Betsy Anderson,** a VP at FR&R Healthcare Consulting in Deerfield Ill., in a presentation on RACs at the 2009 American Association of Homes & Services for the Aging annual meeting.

Speech-language pathology has the most commonly used untimed codes, Kintz notes.

"Speech/hearing therapy and swallowing therapy are examples of two."

Examples of untimed codes for physical therapy include electrical stimulation for stage III and IV ulcers and paraffin bath therapy, Kintz adds. Also keep in mind that most rehab therapy evaluations are untimed codes -- "no matter how long the evaluation took," he says.

The only exceptions are some timed evaluations for SLPs, such as 96105 (Assessment of aphasia [includes assessment of expressive and receptive speech and language function, language comprehension, speech production ability, reading, spelling, writing, eg, by Boston Diagnostic Aphasia Examination] with interpretation and report, per hour) and 96125 (Standardized cognitive performance testing [eg, Ross Information Processing Assessment] per hour of a qualified health care professional's time, both face-to-face time administering tests to the patient and time interpreting these test results and preparing the report) which are each a per hour code. OTs can report 96125 too.

Careful: It's not just the codes themselves you need to watch; modifiers can spring a RAC trap too. For example, "Medicare allows you to use the 59 modifier to identify situations where you provided therapy to more than one body

site," says **Pauline Franko, PT,** principal of Encompass Consulting & Education in Tamarac, Fla. But you can't use a modifier 59 for an untimed code, she stresses.

Watch for Unfair RAC Denials

Even if you're following all the rules, beware mistakes on the RACs' end too.

Case in point: Some providers in Florida have had Part B therapy claims denied because claims had two untimed codes appearing on the same claim, Beckley points out. Yet "there is no prohibition against billing two untimed codes -- the approved [RAC] issue is for two units of an untimed code," Beckley points out. And Florida providers are appealing those denials, she says.

An example of an acceptable claim "would be a speech swallowing evaluation and a speech swallowing service on the same claim," Beckley says.

And if your RAC comes after you for a claim like this, stand your ground and appeal.