

Pain Management Coding Alert

Compliance: Keep Locum Tenens Rules Handy for Fill-In Physicians

Replacement physicians often sub for providers on leave.

Just about every PM practice has, at some time, needed to do without a physician on a temporary basis. Whether it's for sabbatical, vacation, maternity leave, or any other reason, physicians do take time off.

When a practice cannot do without the physician who's taking leave, they'll often hire a locum tenens (LT) physician to fill in so the practice doesn't miss a beat.

LT physicians are a Medicare concept that payers who follow Medicare's guidelines also embrace - and for LTs, there's a specific set of coding rules you'll need to follow in order to bill correctly. Take a look at these LT coding guidelines so you don't miss a beat when coding for a "substitute" physician's services.

Heed this LT Definition

When you bill for an LT physician, "you are billing for a covering physician as if they were the regular physician," explains **Laureen Jandroep, CPC, COC, CPC-I, CPPM**, founder/CEO Certification Coaching Organization, LLC in Oceanville, New Jersey. "Medicare has certain parameters that need to be met in order to bill locum tenens, and many other insurance companies adopt similar policies."

The following advice is based on Medicare's LT guidelines. Other payers - even those that follow Medicare's LT concept - might have different rules when billing for substitute physicians. When reporting a substitute physician's services to a third-party payer, check out their guidelines to see if they differ from Medicare's at all.

LT Must Sub for Physician, and for Limited Time

An LT physician can fill in for 60 continuous days starting with his first date of service, confirms **Jill Young, CPC, CEDC, CIMC**, of Young Medical Consulting LLC in East Lansing, Michigan.

Also, you can only use LT billing rules for physicians who are filling in for physicians on leave, says **Catherine Brink, BS, CMM, CPC**, president of Healthcare Resource Management in Spring Lake, New Jersey. "The LT physician must be substituting for a physician within the practice and not a contractual employee/physician of the practice," she continues.

Know NPI Numbers for Solid LT Billing

When you're billing for an LT physician, you should report all of her services under the Medicare National Provider Identifier (NPI) number of the physician she's subbing for, says Young.

So, if you hire Dr. Sub as an LT physician to fill in for Dr. Vacation, you'll bill all of Dr. Sub's services under Dr. Vacation's NPI.

Modifier alert: When you're billing for an LT physician, be sure you always append modifier Q6 (Service furnished under a fee-for-time compensation arrangement by a substitute physician; or by a substitute physical therapist furnishing outpatient physical therapy services in a health professional shortage area, a medically underserved area, or a rural area) to indicate that you are billing for an LT's services.

Experts: Keep Detailed LT Records

When it comes to documenting an LT's services, experts recommend that the practice keep a record of all the services

the LT physician provides.

"A practice must keep a record of all the services an LT physician provides ... in case of an audit, and for compliance with Medicare billing and coding guidelines," says Brink.

Good idea: In order to ensure you're documenting all an LT's services, you can go back and check the services by date, "since the regular physician would not be seeing/billing for any patients during this time," recommends Young.