

Pain Management Coding Alert

Reader Question: If You Code 99221/99238 Combo, Expect Trouble

Question: Can you ever report 99221 and 99238 on the same day under for the same patient? For example, the admitting physician saw the patient in the morning (99221). Then, later that night, the admitting physician returned to discharge the patient (99238). Is there any way to report both of these codes?

Kansas Subscriber

Answer: No. According to the April 1, 2017 Correct Coding Initiative (CCI) Edits, you cannot bill 99221 (Initial hospital care, per day, for the evaluation and management of a patient, which requires these 3 key components: a detailed or comprehensive history; a detailed or comprehensive examination; and medical decision making that is straightforward or of low complexity ...) together with 99238 (Hospital dischargeday management; 30 minutes or less). This CCI edit includes a modifier indicator of 0, which means you cannot use a modifier to override the edit under any circumstances.

Although 99238 is a hospital discharge code, in your case, it is not the appropriate choice.

According to CPT® 2017, you should only use 99238 to report services provided to a patient on the date of discharge "if other than the initial date of inpatient status."

For you, since the physician admitted and discharged the patient on the same day, CPT® directs you to choose a hospital service codes such as 99234 (Observation or inpatient hospital care, for the evaluation and management of a patient including admission and discharge on the same date, which requires these 3 key components: a detailed or comprehensive history; a detailed or comprehensive examination; and medical decision making that is straightforward or of low complexity ...), 99235 (... a comprehensive history; a comprehensive examination; and medical decision making of moderate complexity ...), or 99236 (... a comprehensive history; a comprehensive examination; and medical decision making of high complexity ...) rather than the 99221/99238 combination.