

Chiropractic Coding & Compliance Alert

Reimbursement /Policy: Know What the 2015 MACRA Act Means for DCs

Chiros to receive documentation reeducation and more.

The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 is here now. What's more, the new legislation has laid out provisions that impact doctors of chiropractic as outlined in section 514, "Oversight of Medicare coverage of manual manipulation of the spine to correct subluxation."

According to the Congress of Chiropractic State Associations (COCSA), section 514 "singles out the chiropractic profession for medical review of spinal subluxation services; possible prior authorization; and increased efforts to improve documentation of services."

It's time for chiropractic providers to take note. "This could impact their revenue stream greatly if they are not up to speed with their documentation and get reviewed or audited," says **Doreen Boivin, CPC, CCA**, with Chiro Practice, Inc., in Saco, Maine.

Know the Provisions of Section 514

Section 514 explains the review/authorization process as it applies to doctors of chiropractic. Starting January 2017, chiropractors performing manual manipulation of the spine to correct a subluxation may come under the process of medical review. This review would target:

- Services furnished by such a chiropractor whose pattern of billing is aberrant compared to peers;
- Services furnished by such a chiropractor who, in a prior period, has a services denial percentage in the eighty-fifth percentile or greater, taking into consideration the extent that service denials are overturned on appeal.

Documentation reeducation: As part of the ongoing federal effort to reduce Medicare claim error rates, the legislation requires HHS and ACA to develop an education program to help improve chiropractic documentation in consultation with Medicare Administrative Contractors (MACs). This needs be implemented by Jan. 1, 2016.

"This would be a great help and CEU's should be offered to chiropractors for this education," believes Boivin.

Good going for chiropractics: The two Chiropractic Associations (American Chiropractic Association [ACA] and COCSA) have issued releases focusing on provisions in the new legislation.

"The ACA fought diligently for the main thrust of the legislation's attempts to reduce the claims error rate to be built around a useful program of education and training, rather than to have the legislation impose an across-the-board pre-authorization requirement that would automatically apply to all DCs providing services under Medicare □ and we succeeded in doing that," said **Dr. Anthony Hamm**, ACA president.

"It is the intention of the ACA to make cooperating state associations 'full partners' working with us to ensure that Medicare claims error rates are reduced to an acceptable level." explains **John Falardeau**, ACA senior vice president for government relations.

Providers would need to strike a synergy with this reform and bring down the rampant denial demon. "This would be a wonderful accomplishment for all involved," thinks Boivin. "It would show that chiropractors are willing to do what is needed to reduce the error rates."

The Congress of Chiropractic State Associations also shared its opinion on Section 514.

"Section 514 has been the subject of much discussion and negotiation at the national level," explains **Dr. John LaMonica**, COCSA president. "We are hopeful that the result of these negotiations will be that the members of the Chiropractic Summit Steering Committee will work together to address the concerns regarding Section 514 and cooperate in any and all legal, legislative, administrative, and educational efforts undertaken regarding the new law."

More in store: There are a lot of good things this new legislations brings along. You get help with your documentation, and then there is the Merit-Based Incentive Payment System (MIPS), following which one would qualify for a portion of \$500 million pool allocated for providers with exceptional performance. Moreover, by 2019, PQRS, EHR, and meaningful use will become a single program for ease of reporting. For more details on the Act, read "Know How the "Final Doc Fix" Saves You From 21 Percent Pay Cuts and More" in Chiropractic Coding and Compliance Alert, Volume 2, Number 5.