



Connecticut State Medical Society - IPA, Inc.

*Building Partnerships Between Business and Medicine*

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## **NEW PATIENT CODE PROGRAM POLICY** **CSMS-IPA Utilization Management Committee**

### **Definition:**

The New Patient code program has been established by the CSMS-IPA Utilization Management Committee (and approved by the IPA Board of Directors) to identify practitioners whose utilization of New Patient codes 99204 and 99205 may not be appropriate. The program will notify practitioners of their status as a candidate for review, offer voluntary review of charts to practitioners who wish to provide substantiation of code utilization or who request a review as a platform for education on appropriate E/M coding and/or documentation. The primary objective of the program is to educate practitioners on the proper use of and documentation for E/M New Patient visits. We may also initiate the application of a financial sanction (commercial product only) in cases where documentation and/or practice patterns have not been substantiated and do not change after notification/education.

### **The goals of the New Patient Code Program include:**

1. Identify potentially inappropriate utilization of New Patient codes 99204 and 99205
2. Educate the IPA membership on appropriate utilization of and documentation for New Patient E/M codes

### **Notification:**

- Letters are sent to all practitioners identified
- Deadlines are expressed in the letter allowing at least 15 business days for chart submission and commencement of education
- Letters are sent to practitioners who previously did not pass chart review, have received educational materials and have had sufficient time to implement changes requesting that they re-submit charts for review

The IPA intends to support practitioners identified as candidates for review and those who request education in the following ways:

- Provide clear communication to the practitioner regarding his or her utilization as compared to benchmarks
- Provide phone consultation regarding visits that have been voluntarily reviewed
- Educate the practitioner on correct coding in the form of an educational packet available on the website ([www.csms-ipa.com](http://www.csms-ipa.com)) and follow up phone consultation as requested
- Communicate with billing and coding staff regarding the review process and final determinations

[www.csms-ipa.com](http://www.csms-ipa.com)  
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Practitioners whose chart materials meet or exceed the minimum documentation requirements set forth by AMA/CPT will be indefinitely exempt from this program. This exemption does not extend to other UMC programs.

Practitioners who are indefinitely exempt will continue to have his or her utilization reviewed through other means.

Practitioners who meet the criteria listed below will be subject to the institution of a sanction upon completion of a Level I UMC Review or within thirty (30) days of the IPA's notification of the audit results to the practitioner if no such UMC review was requested (commercial product only). This sanction is applied to all services and does not take the place of any other utilization review initiative or claims payment policy. The application of a sanction is implemented when:

- A practitioner has gone through one complete cycle of the program, and
- Did not respond to repeated offers of educational chart review and continues to be at or above the IPA's established benchmark, or
- Did not pass chart review
  - Gone through educational program
  - Did not pass second chart review after sufficient time was given to implement educational changes, or
  - Chose not to re-submit charts for review after receiving educational materials and having had time to implement changes

The sanction will continue until practitioner passes a documentation analysis or falls below the benchmark established by the Utilization Management Committee for utilization of CPT codes 99204 and 99205. All practitioners have the opportunity to request an appeal.

**Criteria for Inclusion:**

- Encounter procedure codes: 99201, 99202, 99203, 99204, and 99205
- State: CT CSMS-IPA only
- Paid Data
- Minimum 10 99204's and 99205's, separately or in conjunction, paid during review dates

**Program Benchmarks:**

- $\geq 90\%$  99204-99205 – Endocrinology, Neurology and Oncology
- $\geq 70\%$  99204-99205 - Allergy, Cardiology, Ophthalmology, Pain Management, Pulmonology, Rheumatology
- $\geq 50\%$  99204-99205 - All other specialties

**Program Cycle**

This program will run in 6-month increments.

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