Surviving a Pulmonary Rehab Audit

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Conflict of Interest

Presenter listed has no financial interest/arrangement that would be considered a conflict of interest

PR LCD

- A physician order for all respiratory therapy intervention/service must be recorded in the patient's medical record. The order must clearly indicate the evaluation or treatment to be performed, the specific modality and duration of all aspects of the treatment, including frequency of monitoring.
- Documentation by the physician must indicate the cardiopulmonary diagnosis supporting the medical necessity of the service.
- Documentation must be present in the respiratory services record to show:
  - the plan of treatment and progress toward measurable goals
  - that the care rendered was appropriately delivered by a qualified practitioner. As previously stated, the above services may be performed by respiratory therapists, physical therapists, nurses, and other qualified personnel

PR LCD Cont

- Other qualified personnel may include occupational therapists.
- Therapeutic procedures whose principle aim is to treat a respiratory impairment should be identified using the G0237-G0239 series of codes. CPT codes 97000 to 97799 are not to be billed by professionals involved in treating respiratory conditions, unless these services are delivered by physical or occupational therapists and meet the other requirements for physical and occupational therapy services.
- CORF social and/or psychological services do not include services for mental health diagnoses. Social and/or psychological services are covered only if the patient's physician or the CORF physician establishes that the services directly relate to the patient's rehabilitation plan of treatment and are needed to achieve the goals in the rehabilitation plan of treatment. Social and/or psychological services are those services that address the patient's response and adjustment to the rehabilitation treatment plan: rate of improvement and progress towards the rehabilitation goals, or other services as they directly relate to the respiratory therapy (respiratory care) plan of treatment being provided to the patient.
- Documentation supporting medical necessity should be legible, maintained in the patient's medical record, and must be made available to the A/B MAC upon request.

What is an audit?

- You will be asked to provide information for a set period of time.
- Only required documentation is needed.
Documents you will need:
- Physician Order
- ITP

Physician Order:
- Must be able to print out the Physician order for Pulmonary Rehab
- Even if you are integrated in your EMR you need to be able to reproduce this in a paper copy.

ITP:
- Must contain:
  - All required elements of the LCD
  - Must be easily read
- Non PR folks are going to be doing your audit.

Tips for Success:
- Friends in Low Places
  - Billing Office
  - Compliance
  - Your Office

Billing Office:
- WHOM gets your audit?
- Gives you your audit?
- Updates you on your submission?
- Works with you on getting appropriate documentation?
- Must let them know you want to appeal this
- May require you get a relationship with them before the audit

Compliance:
- The End all that is ALL
- Most hospital systems want compliance involved.
- If your audit is upheld you will need compliance
  - ETC...
GOOD LUCK

Contact

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