

#### Introduction to Medicare: Hospital Perspective

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## **Objectives**

- Describe the Medicare program and payment policies.
- Explain general reimbursement principles related to transfusion medicine services and blood products.
- Explain basic reimbursement principles related to cellular therapies.



#### What Should the Transfusion Service Manager Know About Billing

- 1. What are P, CPT, HCPCS, Revenue and ICD-10 Codes
- 2. How does billing work at your facility
  - How the transfusion service computer system assign internal and CMS billing codes
  - What happens to the billing after it leaves the transfusion service software
- 3. What percentage of patients are on Medicare and private pay



## More - What to Know

- 4. How much of what you bill is for outpatients?
- 5. How is the cost of a product or service determined and a price set in your facility
- 6. How to search the internet for billing information: CMS, AABB, CAP



#### Definitions

- DRG a statistical system of classifying any inpatient stay into groups for the purposes of payment
- APC Used for outpatient billing
- Revenue Code used for inpatient billing



# Diagnosis Related Group (DRG)

- A statistical system of classifying any inpatient stay into groups for the purposes of payment
  - <u>D60</u> Acquired pure red cell aplasia [erythroblastopenia]
  - <u>D61</u> Other aplastic anemias and other bone marrow failure syndromes
  - <u>D62</u> Acute posthemorrhagic anemia
  - <u>D63</u> Anemia in chronic diseases classified elsewhere
  - <u>D64</u> Other anemias



# Revenue Code

- Used for inpatient billing
  - 30x Laboratory-Clinical
    - 300 General
    - 301 Chemistry
    - 302 Immunology
    - 303 Renal Patient (home)
    - 304 Non-routine Dialysis
    - 305 Hematology
    - 306 Bacteriology & Microbiology
    - 307 Urology
    - 309 Other Laboratory



# Ambulatory Procedure Codes (APC)

- 0110 Transfusion
- 0111 Blood Product Exchange
- 0112 Apheresis, Photopheresis, and Plasmapheresis
- 0123 Bone Marrow Harvesting and Bone Marrow/Stem Cell Transplant
- 0954 RBC leukocytes reduced
- 1017 Platelets, aph/pher, L/R, CMV-neg, unit
- 1019 Platelets, aph/pher, L/R, irradiated, unit



## Modifier

- Modifier added to HCPCS code
- Modifier 90 Referred Tests
- Modifier 91 Repeat Tests
- QW Waived test



## Three Levels of HCPCS

- Level I codes AMA's CPT codes and is numeric
- Level II alphanumeric code set primarily non-physician products, supplies, and procedures not included in CPT
- Level III codes "HCPCS local codes" developed by state Medicaid agencies, Medicare contractors, and private insurers for use in specific programs and jurisdictions



# **HCPCS Billing Codes**

- Laboratory Procedure Codes CPT Codes
- Blood Components P Codes
- Procedure Codes Service Codes



#### P Codes

	Table 1. Blood and Blood Products							
HCPCS Code	Short Descriptor	2019 SI	2018 APC	2019 APC	Final 2018 Payment <sup>1</sup>	Proposed 2019 Payment	\$ Change 2018- 2019**	% Change 2018- 2019**
P9010	Whole blood for transfusion	R	9510	9510	\$156.91	\$123.59	-\$33.32	-21%
P9011	Blood split unit	R	9520	9520	\$102.67	\$125.88	\$23.21	23%
P9012	Cryoprecipitate each unit	R	9511	9511	\$44.00	\$44.32	\$0.32	0.7%
P9016	Rbc leukocytes reduced	R	9512	9512	\$183.76	\$183.54	-\$0.22	-0.1%
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	9508	\$72.41	\$73.02	\$0.61	0.8%
P9019	Platelets, each unit	R	9515	9515	\$114.94	\$116.43	\$1.49	1%
P9020	Plaelet rich plasma unit	R	9516	9516	\$123.50	\$131.65	\$8.15	7%
P9021	Red blood cells unit	R	9517	9517	\$142.78	\$144.85	\$2.07	1%
P9022	Washed red blood cells unit	R	9518	9518	\$384.25	\$343.35	-\$40.90	-11%
P9023	Frozen plasma, pooled, sd	R	9509	9509	\$60.57	\$81.51	\$20.94	35%
P9031	Platelets leukocytes reduced	R	9526	9526	\$116.70	\$125.75	\$9.05	8%
P9032	Platelets, irradiated	R	9500	9500	\$179.13	\$180.17	\$1.04	0.6%
P9033	Platelets leukoreduced irrad	R	9521	9521	\$167.64	\$165.17	-\$2.47	-1%

## Laboratory

	Table 3. Transfusion Laboratory Services										
HCPCS Code	Short Descriptor	2019 SI	2018 APC	2019 APC	Final 2018 Payment <sup>6</sup>	Proposed 2019 Payment	\$ Change 2018- 2019**	% Change 2018- 2019**			
86850	Rbc antibody screen	Q1	5671	5671	\$44.70	\$51.41	\$6.71	15%			
86860	Rbc antibody elution	Q1	5672	5672	\$129.17	\$144.65	\$15.48	12%			
86870	Rbc antibody identification	Q2	5673	5673	\$215.42	\$271.73	\$56.31	26%			
86880	Coombs test direct	Q1	5732	5732	\$31.80	\$32.89	\$1.09	3%			
86885	Coombs test indirect qual	Q1	5672	5672	\$129.17	\$144.65	\$15.48	12%			
86886	Coombs test indirect titer	Q1	5672	5672	\$129.17	\$144.65	\$15.48	12%			
86890	Autologous blood process	Q1	5673	5672 <sup>7</sup>	\$215.42	\$144.65	-\$70.77	-33%			
86891	Autologous blood op salvage	Q1	5674	5674	\$540.92	\$532.66	-\$8.26	-2%			
00000	Disad tratas	01	5724	5724	C105-00	\$10C 07	C1 04	20/			



#### **HCPCS** Procedure Codes

	Table 2. Transfusion, Apheresis, and Stem Cell Procedures							
HCPCS Code	Short Descriptor	2019 SI	2018 APC	2019 APC	Final 2018 Payment <sup>4</sup>	Proposed 2019 Payment	\$ Change 2018- 2019**	% Change 2018- 2019**
36430	Blood transfusion service	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36440	Bl push transfuse 2 yr/<	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36450	Bl exchange/transfuse nb	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36455	Bl exchange/transfuse non- nb	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36456	Prtl exchange transfuse nb	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36460	Transfusion service fetal	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36511	Apheresis wbc	S	5242	5242	\$1,221.66	\$1,222.97	\$1.31	0.1%
36512	Apheresis rbc	S	5242	5242	\$1,221.66	\$1,222.97	\$1.31	0.1%
36513	Apheresis platelets	S	5241	5241	\$375.05	\$383.39	\$8.34	2%
36514	Apheresis plasma	S	5242	5242	\$1,221.66	\$1,222.97	\$1.31	0.1%
36516	Apheresis immunoads slctv	S	5243	5243	\$3,699.85	\$3,912.23	\$212.38	6%



#### Reimbursement

Payer	Inpatient	Hospital Outpatient
Medicare	DRG Based prospective payment	APC or ASC classification
	Revenue Codes, ICD-10	CPT, HCPCS, ICD-10



## Scenario 1

- A patient receives two units of leukocyte reduced red blood cells on the same day as the type and screen and electronic crossmatch.
- What "billing" does the transfusion service send to the hospital computer system?
  - A inpatient
  - B outpatient



# Scenario 1 – CPT Codes for Outpatient

- 86900 x 1 ABO
- 86901 x 1 Rh
- 86850 x 1 Antibody Screen
- 86923 x 2 Electronic crossmatch
- P9016 x 2 Red Blood Cells Leukocyte-reduced
- 36430 x 1 Transfusion fee?



# **Inpatient Bill**

Revenue Code	Description	Amount
0300	General Laboratory	004 (ABO, Rh, AS, XM)
0391	Blood Processing and Administration	001 (Infusion fee)
0390	Red Blood Cells	002 (blood component)



## Scenario 2

- Three units of leukocyte reduced irradiated red cells are crossmatched for a patient. Two of the three units are transfused. An Apheresis Leukocytereduced Irradiated Platelet is also transfused.
- What "bill" is issued from the transfusion service?



# Scenario 2 CPT Codes for Outpatient

- 86900 x 1 ABO
- 86901 x 1 Rh
- 86850 x 1 Antibody Screen
- 86923 x 3 Electronic crossmatch
- P9040 x 2 red Blood Cells Leukocyte-reduced
- P9033 x 1 Apheresis leukocyte-reduced platelet
- 36430 x 1 Transfusion fee?



# **Inpatient Bill**

Revenue Code	Description	Amount
0300	General Laboratory	006 (ABO, Rh, AS, 3-XM)
0391	Blood Processing and Administration	001 (Infusion fee)
0390	Red Blood Cells Platelets	002 (blood component) 001



#### Pathogen Reduction /Testing Changes

- CMS deactivated the use of code P9072 for the Medicare program, and established two new codes, Q9987 and Q9988.
- Q9988 (platelets, pheresis, pathogen reduced, each unit) is a product code
- Q9987, pathogen test(s) for platelets is separately payable testing code



# Change Billing Date for Molecular

- 42 C.F.R. § 414.510(b) to establish that in the case of a molecular pathology test ... that meets the criteria of Section 1834A(d)(5)(a), the date of service must be the date the test was performed (the date of final report).
- **Problem:** The testing agency bills Medicare directly.
- **Question:** Does this apply to blood centers?



# **Billing Problem Areas**

- Electronic Crossmatch
- Split Units
- Directed Donor Units
- Autologous Units
- Units transported with patients
- Antigen typing
- How much should I charge for blood



## **Electronic Crossmatch**

- Cannot bill with any other type of crossmatch
- Serologic Crossmatch
  - Bill for each phase performed and documented



# **Split Units**

- Regardless of the component, the P code for the split product is P9011 (Blood, split unit)
- CPT 86985 may be used to bill for the process of splitting each unit each time it is done, cannot bill for the last part if it is not put in a syringe or bag as it was not "split"
- DO NOT bill any other blood component "P" code



## **Directed Donor Units**

 Bill for the product transfused as usual product "P" code

 There are no special CPT codes or "P" codes for additional "Directed Units" fees



## Autologous - Transfused

- If the blood WAS transfused
  - Use Revenue Code 039X (0391 an option)
  - Bill CPT 36430 Transfusion Fee
  - P code for the product



## Autologous – Not Transfused

- If the blood was NOT transfused
  - Use Revenue Code 039X (0391 an option)
  - Bill CPT 86890 (predeposit)
  - Do not bill a P code for the product
  - Do not bill Transfusion Code 36430



# Service Date for Billing Autologous

- If transfused
  - Use the date of transfusion times the number of units transfused

- If not transfused
  - Us the intended date of transfusion times the number of units not transfused



# Antigen Typing of Donor Units

#### - Bill per individual unit

- 86902 antigen screening for compatible blood using reagent serum, per **antigen** screened
- 86904 antigen screening for compatible unit using patient serum, per unit screened



## Which Patient Gets Billed?

- If antigen typing is done on one patient but the units are given to another patient who also needs antigen negative units, who gets billed?
- Ans: The first patient or the second patient but not both
- Whoever told you life was fair lied.



Who Pays for Blood Wasted During the Transport of a Patient?

- Cannot bill the patient for wasted units
- Add the cost of outdated units to the overhead
- Receiving facility may accept unused units into inventory if properly stored until arriving in the blood bank



# How much do I charge for Blood Components?

- It is not just what it cost from the supplier
- Answer: What it costs you to provide the product
  - Cost from blood supplier
  - Cost of waste
  - Processing
  - Handling
  - Dedicated equipment
  - Overhead (power, non-dedicated equipment)



#### What Should the Transfusion Service Manager Do

- 1. Review billing annually with hospital billing office to ensure billing is coded correctly
- 2. Make billing changes based on new information from CMS
- 3. Review denied claims
  - Billing errors
  - New interpretations



#### Resource

22	🛞 Find a DNA La	ab 💙 Give B	lood 🚺 I	Marketplace Log In	0 Items	
Advancing Transfusion and				Search	٩	
Cellular Therapies Worldwide		About AABB	Contact Us	Calendar of Events	Press JOIN	
STANDARDS & ACCREDITATION 🗸	PROGRAMS & SERVICES V ADVOCAC	Y 🗸 PROFESSION	NAL DEVELOPM	ent 🗸 research 🖌 M	Membership 🗸	
Billing and Reimbursement Initiatives	Home > Advocacy > Billing and Re	eimbursement In	itiatives		🕻 🖸 ն 🕒 <u>Print</u>	
Regulatory Affairs	Billing and Reimburg	sement In	itiatives	AABB Resour	rces	
Statements	AABB is committed to seeking enhar		TABB Bining Gui	AABB Billing Guide		
Comments	blood products, and transfusion services both education regarding the complexity of the services of the servic			Billing for Blood	Billing for Blood and Transfusion	
Correspondence	and advocacy to reimbursement pol	icy makers.		Services FAQ		
Regulatory and Public Meetings	<u>News</u> Reimbursement Advocacy			External Reso	ources	
Stop the Bleed	News			CMS Outpatient	Billing Guidance	
	AABB, America's Blood Centers and t Comments on Proposed Medicare H and Policies for 2019				lance for Stem Cell	
	AABB, America's Blood Centers and t				lance for Stem Cell	
	joint comments to the Centers for M in response to the proposed rule up and rates for hospital outpatient ser	dating Medicare	payment polici	ies <u>CMS Transmittal</u> ns	<u>plants - Outpatient</u> Transmittals	
	highlighted that the proposed reimb		1 0	CMS Manuals	le like ha Felies	

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# QUESTIONS?





# **Decoding Medicare**

Leah Mendelsohn Stone, JD Director, Public Policy and Advocacy AABB

October 16, 2018

#### **Faculty Disclosure**

(In compliance with ACCME policy, AABB requires the following disclosures to the session audience)

• No disclosures to report.



# Objectives

- Establish a basic understanding of the Medicare program
- Understand Medicare hospital inpatient payment policy
- Understand Medicare hospital outpatient payment policy



"Ready to walk the Reimbursement Maze?"



# **AABB** Antitrust Policy

- AABB complies with all applicable antitrust laws and regulations.
- Accordingly, discussions regarding current or future pricing or price standardization, procedures, discounts, credit terms, allocation of markets, unfair refusals to deal with a community member, fair profit levels, and other price related topics must be avoided at AABB meetings.
- In the event that today's discussion appears to be headed into any such areas, I will raise the issue immediately, and ask that/invite you to do the same, so that further discussion of such matters can be suspended.



## **Health Care Payors**



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# Payors

- Medicare
- Medicaid
- Private Health Insurers
  - Employer Sponsored
  - Marketplace
- Other
  - VA
  - DOD
  - CHIP





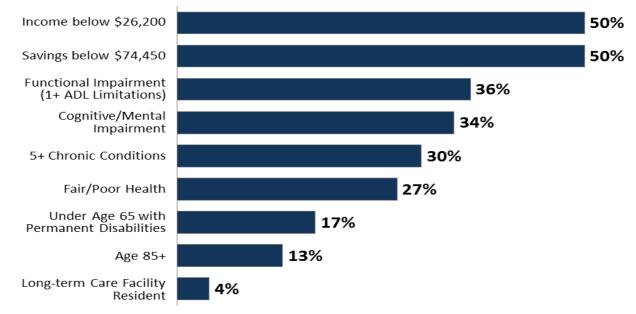
#### **Medicare Basics**



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#### Figure 1 Characteristics of the Medicare Population

#### Percent of total Medicare population:



NOTE: ADL is activity of daily living.

SOURCE: Kaiser Family Foundation analysis of the Centers for Medicare & Medicaid Services Medicare Current Beneficiary 2013 Cost and Use file; Urban Institute/Kaiser Family Foundation analysis of DYNASIM data, 2017 (for income and savings).



KAISER

FAMILY

## **Medicare Framework**

#### Part A

- Inpatient Hospital Services
- Skilled Nursing Facility Services
- Hospice Care
- Home Health Services

#### Part B

- Hospital Outpatient
   Services
- Physician Services
- Therapy Services
- Clinical Laboratory and Other Diagnostic Tests
- Durable Medical Equipment, Prosthetics, Orthotics, and Supplies
- Certain Drugs and Biologics

#### Part C

- Medicare Advantage
- Administered by private companies
- Must cover Part A and Part B services, except hospice
- Often includes Part D benefits

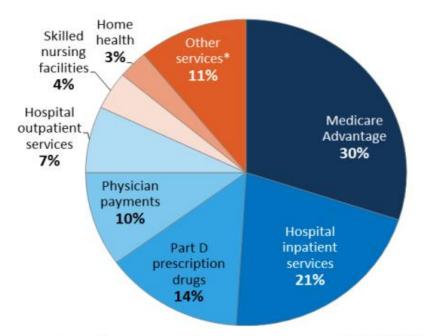
#### Part D

- Administered by private companies
- Covers certain prescription drugs



#### Figure 2

#### Medicare Benefit Payments by Type of Service, 2016



#### Total Medicare Benefit Payments, 2016: \$675 billion



NOTE: \*Consists of Medicare benefit spending on hospice, durable medical equipment, Part B drugs, outpatient dialysis, outpatient therapy, ambulance, lab, community mental health center, rural health clinic, federally qualified health center, and other Part B services.

SOURCE: Congressional Budget Office, June 2017 Medicare Baseline.



# Medicare Coverage

- Medicare covers and pays for items and services that are "<u>reasonable</u> <u>and necessary</u> for the diagnosis or treatment of an illness or injury, or to improve the functioning of a malformed body member."
- Medically necessary blood transfusion is generally a Medicare covered service under Medicare Parts A and B.

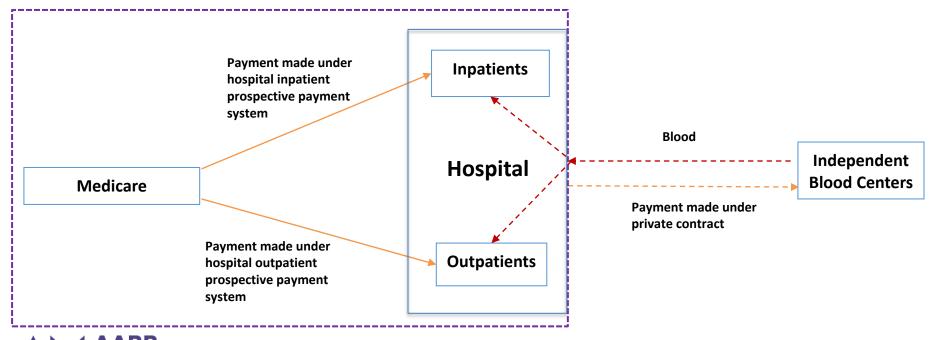
Sources:

Social Security Act \$1862(a)(1)(A), 42 U.S.C. 1395y(a)(1)(A). Medicare National Coverage Determinations Manual (CMS Pub 100-3), Chapter 1, Part 2, \$110.7





## Payment for Blood





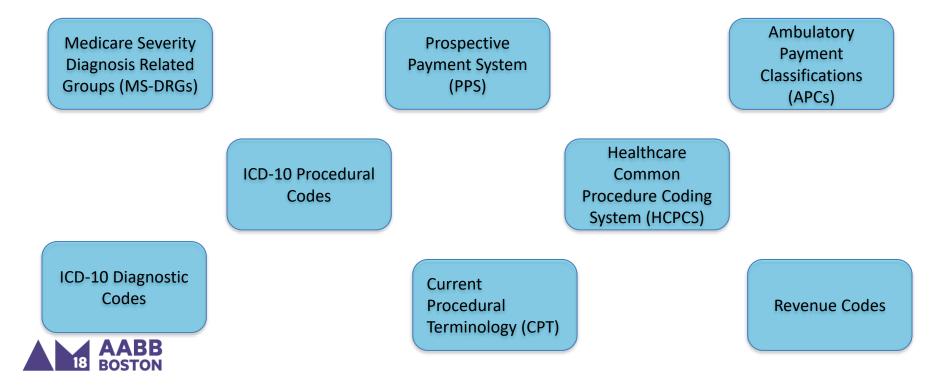
# **Unused Blood**

- Hospitals cannot bill Medicare for blood that has not been transfused.
- For unused blood:
  - Processing and storage costs incurred by community blood bank and the hospital:
    - Cannot be charged to the beneficiary.
    - Can be reported as costs under cost centers for blood on hospital's Medicare Cost Report.
  - Hospitals can bill for certain patient-specific blood preparation costs (i.e., blood typing and cross-matching).
  - Hospitals can bill for splitting or irradiating a blood product with the specific intent of transfusion to a beneficiary.
    - Hospitals may not bill for the HCPCS code for the blood product that was not transfused.
  - Hospitals cannot bill for splitting or irradiating and storing a blood product <u>without specific intent</u> to administer it to a beneficiary at the time of splitting or irradiation.
    - No service to report.

Source: Medicare Claims Processing Manual (CMS Pub. 100-04), Chapter 4, §231.



## **Medicare Payment Terms**

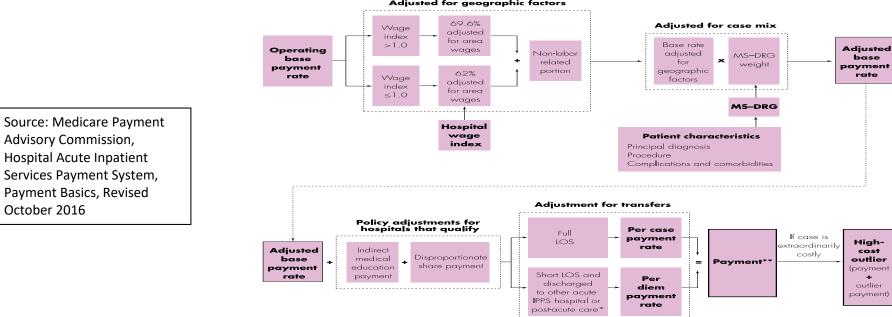




"In one respect it is simpler than some of the other Medicare payment models."



#### Hospital Inpatient Prospective Payment System



#### Adjusted for aeoaraphic factors

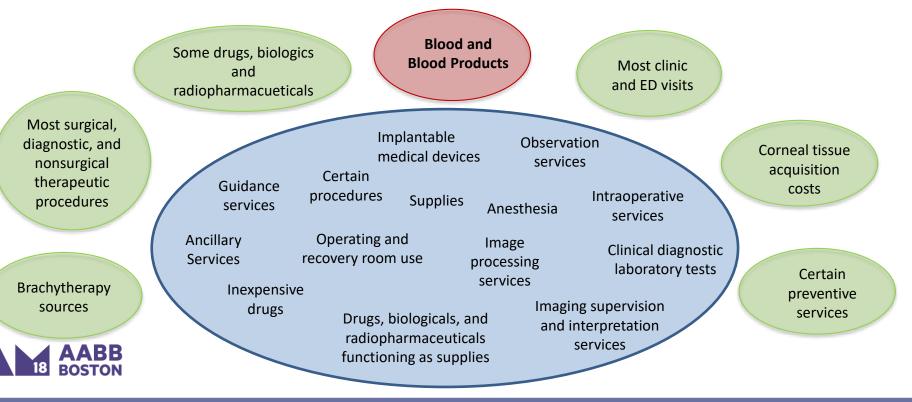
Figure 1 Acute inpatient prospective payment system

Note: MS-DRG (Medicare severity diagnosis related group), LOS (length of stay), IPPS (inpatient prospective payment system). Capital payments are determined by a similar system

\* Transfer policy for cases discharged to post-acute care settings applies for cases in 275 selected MS-DRGs

\*\* Additional payment made for certain rural hospitals

## Medicare: Hospital Outpatient Services

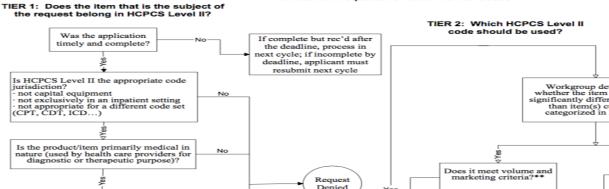


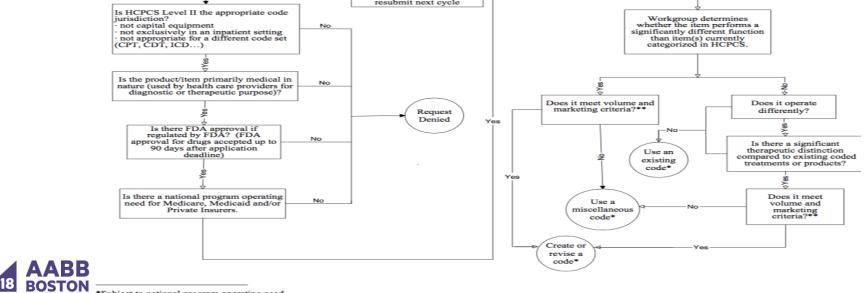
#### Payment for Blood Furnished to Hospital Outpatients

- Specific blood product APCs
  - Each blood HCPCS code is assigned to an APC
  - Payment rates include costs of blood and blood products, as well as costs for collecting, processing and storage of blood and blood products
- Payment rates determined using blood-specific cost-to-charge ratio
  - Ratio of the cost divided by the charges
  - Uses actual or simulated CCRs from most recently available hospital cost reports
- Payment rates updated annually



#### **New Blood Products**





HCPCS Decision Tree For External Requests to Add or Revise Codes

\*Subject to national program operating need

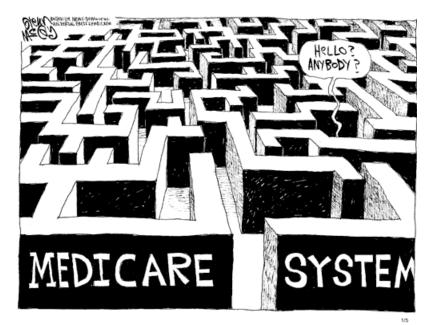
\*\*For drugs, volume and marketing criteria are waived, and "ves" is assumed for the purpose of following the decision tree

## Questions?

#### Leah Mendelsohn Stone

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## **Professional Billing & Apheresis**

Mary Berg, MD Professor of Pathology University of Colorado

10/16/18

#### **Faculty Disclosure**

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• Nothing to disclose



# **Objectives**

- Describe the Medicare program and payment policies.
- Explain general reimbursement principles related to transfusion medicine services and blood products.
- Explain basic reimbursement principles related to cellular therapies.



How Do Transfusion Medicine Physicians Get Paid?

- General billing issues
- Transfusion Service
- Apheresis
  - Therapeutic procedures
  - Donor (especially stem cell) procedures
- Immune effector (CAR-T) cells



# Professional (Physician) Billing

 Physicians use the CMS-1500 claim form to report their work in all settings

HEALTH INSURANCE CLAIM FORM					
APPROVED BY NATIONAL UNIFORM CLAIM COMMITTEE (NUCC) 02/12					
PICA			PICA		
1. MEDICARE MEDICAID TRICARE CHAMPVA GROUP	N BLKTUNG	1a. INSURED'S I.D. NUMBER	(For Program in Item 1)		
(Medicare#) (Medicaid#) (ID#/DoD#) (Member ID#) (ID#)					
2. PATIENT'S NAME (Last Name, First Name, Middle Initial) 3. PATIENT'S BIRTH MM   DD		4. INSURED'S NAME (Last Nam	e, First Name, Middle Initial)		
5. PATIENT'S ADDRESS (No., Street) 6. PATIENT RELATION		7. INSURED'S ADDRESS (No., 1			
		7. INSURED'S ADDRESS (No., S	street)		
CITY STATE & RESERVED FOR		СПУ	ISTATE		
			UNIC		
ZIP CODE TELEPHONE (Include Area Code)		ZIP CODE	TELEPHONE (Include Area Code)		
9. OTHER INSURED'S NAME (Last Name, First Name, Middle Initial) 10. IS PATIENT'S CC	NDITION RELATED TO:	11. INSURED'S POLICY GROUP	OR FECA NUMBER		
a, OTHER INSURED'S POLICY OR GROUP NUMBER 0. EMPLOYMENT? (I	Current or Previous)	A INSUBED'S DATE OF BIRTH	SEX		
		a, INSURED'S DATE OF BIRTH SEX			
b. RESERVED FOR NUCC USE b. AUTO ACCIDENT	7 PLACE (State)	b. OTHER CLAIM ID (Designate	I by NUCC)		
YE					
c. RESERVED FOR NUCC USE C. OTHER ACCIDEN	T?	c. INSURANCE PLAN NAME OF	PROGRAM NAME		
YE					
d. INSURANCE PLAN NAME OR PROGRAM NAME 10d. CLAIM CODES	(Designated by NUCC)	d. IS THERE ANOTHER HEALTH BENEFIT PLAN?			
READ BACK OF FORM BEFORE COMPLETING & SIGNING THIS FO		If yes, complete items 9, 9a, and 9d.			
<ol> <li>PATIENT'S OR AUTHORIZED PERSON'S SIGNATURE I authorize the release of any medical to process this claim. I also request payment of government benefits either to myself or to the party</li> </ol>	payment of medical benefits t	o the undersigned physician or supplier for			
below.	who accepts assignment	services described below.			
SIGNEDDATE		SIGNED			
14. DATE OF CURRENT ILLNESS, INJURY, OF PREGNANCY (LMP) 15. OTHER DATE		16. DATES PATIENT UNABLE T	O WORK IN CURRENT OCCUPATION		
QUAL. QUAL.		FROM	то		
17. NAME OF REFERRING PROVIDER OR OTHER SOURCE 17a.			Y AMA DD YY		
17b. NPI		FROM	то		
19, ADDITIONAL CLAM INFORMATION (Designated by NUCC) 20, OUTSIDE LA8? \$ CHARGES					
21, DIAGNOSIS OR NATURE OF ILLNESS OR INJURY Relate #< to service into below (24E) to p.t. 22, RESUBMISSION					
CODE ORIGINAL REF. NO.					
24. A. DATE(S) OF SERVICE B. C. D. PROCEDURES, SERVICES, C	DR SUPPLIES E.	F. G. DAYS	H. I. J. PSDT III PENDERING		
From         To         PLACE OF         (Explain Unusual Circumstan OD YY           MM         DD         YY         SERVICE         EMG         CPT/HCPCS         MOI	ces) DIAGNOSIS DIFIER POINTER	S CHARGES UNITS	Family ID. RENDERING Plan QUAL PROVIDER ID. #		
			NPI		
	1 1 1				
			NPI		



# Professional (Physician) Billing

• Claims for physician services must be billed with an appropriate CPT code (= level I HCPCS code) to describe the service.

СРТ	APC	Descriptor	
38205	*	Blood-derived hematopoietic progenitor cell harvesting for transplant: allogeneic	
38206	5242	Blood-derived hematopoietic progenitor cell harvesting for transplant: autologous	
36511	5242	Therapeutic apheresis; for white blood cells	
36512	5242	Therapeutic apheresis; for red blood cells	
36513	5241	Therapeutic apheresis; for platelets	
36514	5242	Therapeutic apheresis; for plasma pheresis	
36516	<b>6516</b> Therapeutic apheresis; with extracorporeal selective adsorption or selective filtr		
	5245	plasma reinfusion	
36522	5243	Photopheresis, extracorporeal	
		Blood bank physician services: difficult crossmatch and/or evaluation of irregular antibody(s),	
86077	5732	interpretation and written report.	
		Investigation of transfusion reaction including suspicion of transmissible disease, interpretation	
86078	5672	and written report.	
		Authorization for deviation from standard blood banking procedures (e.g. use of outdated blood,	
86079	5671	transfusion of Rh incompatible units), with written report.	

# Professional (Physician) Billing

- Each CPT code has a fee associated with it that is based on:
  - The physician work (effort)
  - Practice expenses
  - Liability costs required for that particular service
  - Adjustment for geographic variations associated with medical practice.



## 86077

- Interpretation of irregular red cell alloantibodies from antibody panels.
  - When red cells cannot be safely released without the review of a physician or when it is part of the laboratory policy to have a pathologist interpret incompatible crossmatches, etc.
  - Blood bank physician interpretation and / or recommendation for future transfusions for:
    - Red cell alloantibody panels
    - ABO discrepancies
    - Work-up of positive DATs in hemolytic disease of the newborn
    - Prenatal workup for Rh immune globulin administration



## 86078

- Evaluation of reported transfusion reactions includes:
  - Review of the patient's clinical history and events before and after the adverse reaction
  - Evaluation of post-reaction blood bank evaluation (e.g. visual inspection, clerical check) and laboratory studies (e.g. posttransfusion DAT, urinalysis, LDH, haptoglobin)
  - Impression of the underlying cause of the reaction or differential diagnosis
  - Recommendation for the treatment of the adverse reaction
  - Recommendation for future transfusions, which includes comments on prophylaxis or special product modifications



## 86079

- Use of Special Blood Products
- Medical consultation when a physician requests special products, which may or may not be part of hospital or laboratory policy or are contraindicated
- Includes reports / recommendations for:
  - Transfusion of mismatched Rh products (i.e. Rh positive products to an Rh negative patient)
  - Irradiated products
  - Components for transplants when the donor and recipient have different ABO types
  - Use of blood beyond its normal expiration time



#### Professional (Physician) Billing in Apheresis

- Medicare and some private insurers reimburse physicians for inpatient and outpatient care according to a resource-based relative value scale (RBRVS) fee schedule.
  - CMS publishes the Physician Fee Schedule, updated annually
- Billing for inpatient stays are based on Diagnostic Related Groups (DRGs)
  - Modifiers can be used to increase reimbursement, if justified based on documentation (e.g. complications)
  - Separate billing for physician services is not allowed



## **Therapeutic Apheresis Codes**

- Coding for apheresis services varies depending on whether it is a therapeutic procedure or donor collection.
- Different types of therapeutic apheresis involve different levels of work & so are assigned different RVUs.

	CPT Code	АРС	DESCRIPTION	Work RVU 2018
	36511	5242	Therapeutic apheresis; for white blood cells	2.00
	36512	5242	Therapeutic apheresis; for red blood cells	2.00
	36513	5241	Therapeutic apheresis; for platelets	2.00
	36514	5242	Therapeutic apheresis; for plasmapheresis	1.81
	36516	5243	Therapeutic apheresis; with extracorporeal selective adsorption or selective filtration and plasma reinfusion (ie, LDL apheresis)	1.56
ľ	36522	5243	Photopheresis, extracorporeal	1.75

## Stem Cell Apheresis Codes

• Other costs for services necessary for a stem cell transplant are part of the reimbursement for the transplant (separate from the collection code)

СР	די	APC	DESCRIPTION	Work RVU 2018
382	05	*	Blood-derived hematopoietic progenitor cell harvesting for transplant: allogeneic	1.50
382	.06	5242	Blood-derived hematopoietic progenitor cell harvesting for transplant: autologous	1.50



## Immune Effector Cells

- CMS only offers codes for products that are FDAapproved
- HCPCS codes include:
  - Collection
  - Processing
  - Infusion

HCPCS Code	APC	Short Descriptor
Q2040	9081	Tisagenlecleucel* car-pos t
Q2041	9035	Axicabtagene ciloleucel** car+



# **Questions?**

• Thank you!



#### Excerpt from 'An Ode to a Code'

You might think water skiing's fun ICD sees it differently, son. They imagine things dire Like skis catching fire Thank goodness there's a code for that one!

V91.07XA Burn due to water-skis on fire, initial encounter

Love fishing? What could go wrong? For ICD-10, it doesn't take long For your boat to be crushed All its passengers flushed Submerged, drowned, and gone.

**V90.32XA** Drowning and submersion due to falling or jumping from crushed fishing boat, initial encounter

Robert H. Shmerling, MD the-rheumatologist.org/article/icd-10-an-ode-to-code



#### Introduction to Reimbursement for Transfusion Medicine, Blood Products and Cellular Therapy Services



# **Faculty Disclosures**

The following faculty have no relevant financial relationships to disclose:

- Leah Stone JD
- Mary Berg MD

The following faculty have a relevant financial relationship:

 Suzanne Butch MLS(ASCP)SBBCM
 Cardinal Health: Stock Shareholder (self- managed)
 BC Solutions: Consultant
 Becton Dickinson: Stock Shareholder (self-managed)



# Learning Objectives

- Describe the Medicare program and payment policies
- Explain general reimbursement principles related to transfusion medicine services and blood products
- Explain basic reimbursement principles related to cellular therapies

