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The provider of care is ultimately responsible for providing accurate and compliant information on all submission of claims and/or billing information.

For further information or questions regarding this presentation, please contact the UPMC Health Plan Risk Adjustment team at riskadjustment@upmc.edu.

This information is current as of Sept. 1, 2021.

E&M Documentation for Diagnosis Reporting

- 1. Importance of diagnosis documentation and reporting
 - Risk adjustment (RA) overview
 - Severity of illness
 - RADV audit
- 2. Provider diagnosis documentation requirements
 - E&M guidelines
 - ICD-10-CM guidelines
- 3. Provider documentation problematic to RADV audits
 - Uncertain terminology
 - Active vs. "history of"
 - Specific conditions

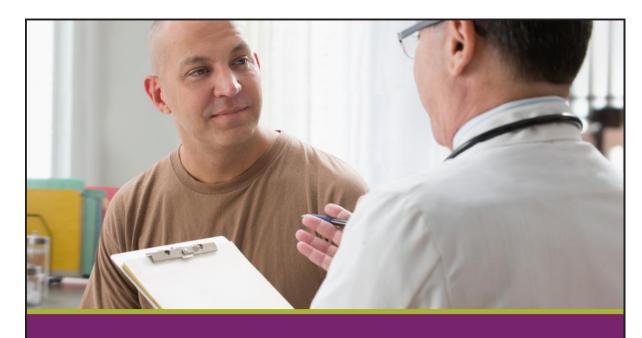


AGENDA

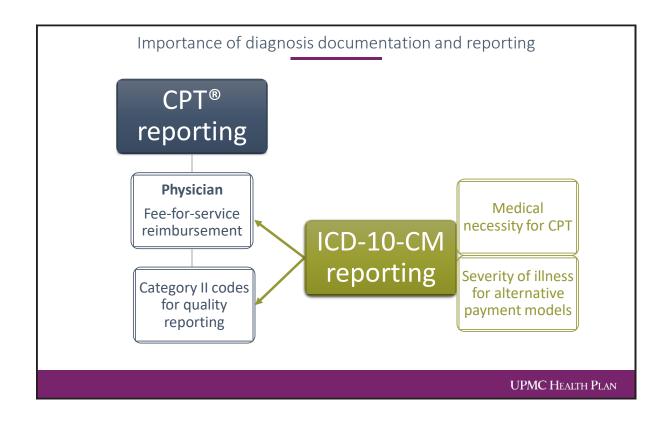
- 4. Documentation in practice
 - Review of actual provider documentation
- 5. Resources for diagnosis documentation and coding education
 - UPMC HP Provider OnLine coding tools
 - UPMC HP RA Physician
 Educator team
- 6. References
- 7. Live Q&A session

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1 Importance of diagnosis documentation and reporting



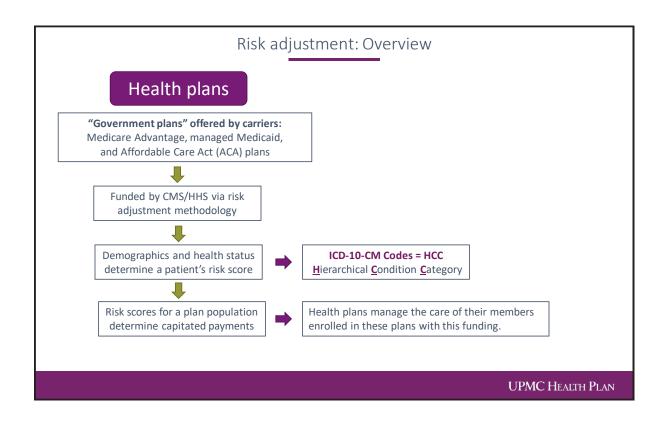
Risk adjustment: Overview

Risk adjustment is ...

- A payment methodology implemented for Medicare Advantage plans by the Centers for Medicare and Medicaid Services (CMS) that is now being used across all facets of health care.
- Based on payment for serious or chronic conditions from reported ICD-10-CM diagnosis codes.
- A model that aims to make comprehensive insurance available to all individuals, regardless of risk.

Payment models are moving from fee-for-service toward value-based compensation.

• To efficiently transition to value-based compensation, providers need a good understanding of risk adjustment.

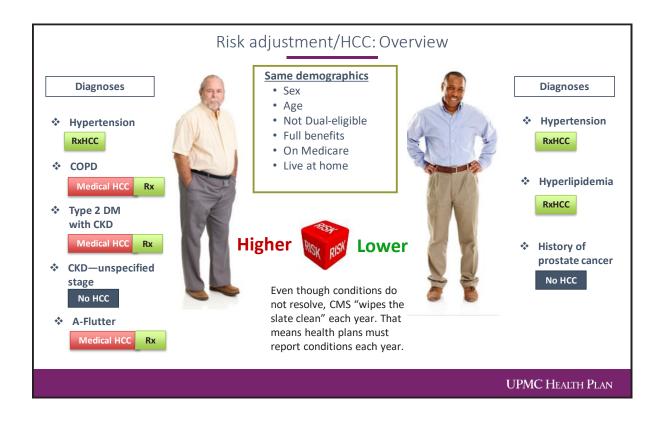


Risk adjustment: Overview

Severity of illness

- In the Medicare Advantage model, in addition to "Medical HCCs," **RxHCCs** are a part of the model used by CMS to support Medicare Part D (prescription drug program).
 - Medical HCCs typically carry a higher risk.
- Not all ICD-10-CM diagnosis codes map to an HCC.
- HCC conditions are categorized hierarchically.
- The highest severity reported in the calendar year for that category is used to calculate the patient's risk score.

Example	HCC	HCC Description	Severi	ty		
	17	Diabetes with <u>Acute</u> Complications	Highes	t		
Diabetes Hierarchy	18	Diabetes with Chronic Complications	High	E11.22 Type 2 DM w/CKD		
· · · · · ·	19	Diabetes with <u>No</u> Complications	Lower	E11.9 Ty	pe 2 DM, uncomplicat	ted



Risk adjustment: Overview

Provider

- In performance-based payment models (such as the merit-based incentive payment program [MIPS]), providers' payments are closely tied to their patients' health outcomes.
- Improved performance of quality measures is achieved through risk adjusting the acuity in patients
 through accurate diagnosis reporting. RA allows for more accurate comparisons of providers and their
 patients' health outcomes by accounting for the differences in their patients' health acuity.
- Providers participating in a shared savings program may see HCC capture as a revenue component relating to a medical expense ratio (MER).
 - Generally, revenue minus expenses = shared savings
- Addressing risk-adjusted conditions improves direct patient care management and targets prevention and intervention for patients.
- The goal is for the provider to report an accurate clinical picture of the patient.

RADV audits

- Risk adjustment data validation (RADV) is the process by which CMS/HHS verifies that diagnosis codes submitted for payment by a Medicare Advantage or ACA plan are supported by provider medical record documentation for the enrollee.
- The Office of the Inspector General (OIG) also performs RADV audits.
 - These governing bodies are looking to see if the provider documents the reported diagnosis as managed, evaluated, assessed, and/or treated during the encounter in the medical record.

CMS

National finding:

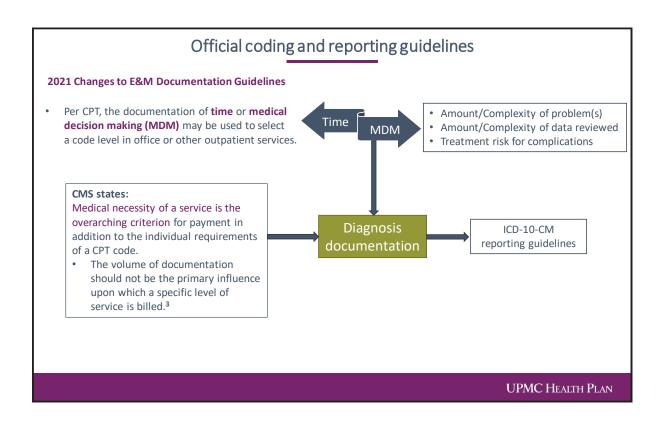
40% error rate¹ for diagnoses reported on claims not documented by the provider as being addressed during the encounter.

OIG

Targeted reviews:²

Prior OIG reviews show diagnoses considered at high risk to be unsupported by the medical record.





Official coding and reporting guidelines

2021 Changes to E&M Documentation Guidelines



Problem⁴

A disease, condition, illness, injury, symptom, sign, finding, complaint, or other matter addressed at the encounter, with or without a diagnosis being established at the time of the encounter

Problem addressed⁴

A problem is addressed or managed when it is evaluated or treated at the encounter by the provider reporting the service.

Best practice documentation Show elements of M.E.A.T.

<u>M</u>anagement, <u>E</u>valuation, <u>A</u>ssessment, and/or <u>T</u>reatment

- Assessment of the condition
- Review of prior records from other providers (outside of the practice)
- Review of test/lab/referral record data
- Social determinants of health screening
- Clear treatment plan with named medication
- Risks of the treatment plan

Official coding and reporting guidelines

Document for medical decision-making credit

Diagnoses:

- Established or new problem:
 - Explicitly stated or implied in documented decisions regarding management plans and/or further evaluation.
- Assessed using terminology of "stable," "improving," or "worsening":
 - A notation of "abnormal" or "worsening" without elaboration or a documented change in treatment is considered insufficient.
- Acute or chronic:
 - With or without exacerbation, progression, or side effects of treatment
 - With uncertain prognosis

Data considered:

- Results of each unique test
- Each unique test ordered
- Prior records from each external source (e.g., specialist's records)
- Assessment requiring an independent historian
- Independent interpretation of a test performed by another physician or health care professional and not separately reported
- Discussion of management or test interpretation with external physician or other qualified health care professional

Risks of treatment plan:

- Name(s) of the over-the-counter or prescription drugs for each diagnosis (not just the medication list)
 - Drug therapy requiring intensive toxicity monitoring
- Diagnosis for treatment affected by comorbidities or underlying conditions
- Diagnosis or treatment significantly limited by SDOH
- Risk of morbidity from diagnostic testing, treatment ordered, or surgical procedures

Official coding and reporting guidelines

2021 CPT Evaluation and Management

21 Ci i Evaluation and Management

A problem is addressed or managed when it is evaluated or treated at the encounter by the provider reporting the service.

Problem addressed⁴



ICD-10-CM Official Guidelines for Coding and Reporting

Code all documented conditions that coexist at the time of the encounter/visit and require or affect patient care treatment or management. Do not code conditions that were previously treated and no longer exist.⁵



Problematic documentation: 'History of'5

Diagnoses of **acute/active conditions** typically report an HCC whereas reporting a "history of" a condition does not.



Clinician interpretation

Past or active condition?

Example: "20-year history of smoking"

"Currently smoking for the past 20 years."

"Smoked for 20 years but stopped."

ICD-10-CM interpretation

"History of" = past condition that no longer exists.



Do not use "history of" in generalized terms for a chronic or incurable condition.

Problematic documentation: Acute/Active condition vs. 'History of' 6



Myocardial infarction

ICD-10 code categories I21 and I22
 Typically, not happening in the office

CVA or stroke

ICD-10 code category I63
 Typically, not happening in the office



- Acute codes are allowed to be reported within four weeks (or 28 days) of the acute onset.
- After four weeks (or 28 days), document as "history of MI" or "old MI" and report code I25.2 Old myocardial infarction.
- Does the patient have residuals?
 - Yes: Document "history of CVA with the named residual" and an A&P for the CVA after-care and residual.
 - Report: CVA with residuals from code category 169.3
 - No: Document "history of CVA" and an A&P for the CVA after-care.
 - Report: code Z86.73 Personal history of [TIA] and cerebral infarction without residual deficits

Problematic documentation: Acute/Active condition vs. 'History of'⁷

Deep vein thrombosis

Active conditions

Pulmonary embolism



- ICD-10 code category I82.4 (Acute)
 Typically, new thrombus initiating
 anticoagulant therapy
- ICD-10 code category I82.5 (Chronic)
 Typically, previously diagnosed and still exists
- ICD-10 code category I26 (Acute)
 Typically, new embolism initiating
 anticoagulant therapy
- ICD-10 code category I27.8 (Chronic)
 Typically, long-standing/reoccurring and continuation of established anticoagulation

■ Is the DVT/PE resolved? ■



- Do not use "history of" DVT or PE terminology.
- Acute
 - Recent hospitalization for acute DVT/PE within 3-6 months, recommended anticoagulation therapy
- Chronic
 - Number and frequency of episodes
 - Anticoagulation given as treatment for "chronic" DVT/PF
 - Need for lifelong anticoagulation therapy
 - Greenfield (IVC) filter placement

Yes—the DVT/PE is resolved:

- Document "history of" DVT/PE.
 - If applicable, note prophylactic anticoagulation to prevent recurrence of DVT/PE.
- Report code:
 - Z86.718 Personal history of venous embolism and thrombosis
 - Z86.711 Personal history of pulmonary embolism



Problematic documentation: Active cancer vs. 'History of' cancer⁸

Clinically:

Many providers consider cancer "active/current" until five years have passed since treatment and want to use an "active/current" cancer diagnosis within that period.

- This medical concept does not carry over to ICD-10-CM coding.
 - ICD-10-CM coding guidelines do not capture this information and it would be
 inappropriate to code it as an "active/current" cancer because it does not meet the
 standards of the coding guidelines.

Providers consider monitoring a patient with a "history of" cancer as "active treatment" and want to use an "active/current" diagnosis.

• In ICD-10-CM coding guidelines, "monitoring" and "active treatment" do **not** mean the same thing.

Problematic documentation: Active cancer vs. 'History of' cancer⁸

One of the following must be documented to report the cancer as active:

Active disease or active treatment

Disease status



Current treatment^{8,9}



Surgery; radiation; chemo- and or immunotherapy (including biological adjuvants-monoclonal antibodies); and, in some instances, hormonal drug therapy

Problematic documentation: Active cancer vs. 'History of' cancer



- Prior to documenting or choosing a diagnosis code from the EHR:
 - Determine if the cancer is active/current or not.
 - Update problem lists or visit diagnosis lists to history of cancer when applicable.
 - Avoid mixing or using "history of" when the patient has "active/current" cancer.

Decision table ^{8,9}					
Disease status	Disease status Treatment				
Not eradicated	None	Active cancer			
Not eradicated	Surgery, radiation, chemotherapy, or immunotherapy				
No residual	Surgery, radiation, chemotherapy, or immunotherapy	Active cancer			
disease	Hormonal drug therapy documented as part of an active treatment plan				
No residual	Hormonal drug therapy documented as preventive or prophylactic treatment				
disease	Hormonal drug therapy lacking documentation as active or prophylactic	"History of" cancer			
4.50450	Completed active treatment (surgery, radiation, chemotherapy, or immunotherapy)				

Problematic documentation: Active cancer vs. 'History of' cancer

Hx of Prostate CA (Z85.46)

Primary care record

HPI: Patient present for follow-up of chronic conditions of DM, HTN, CAD, and prostate CA diagnosed in 2017. PT is followed by oncology.

ROS: Negative Exam: No GU Exam

A&P:

Type 2 DM (E11.9)......

Prostate CA (C61): Follows with

Oncology

HTN (I10) CAD (I25.2).....

Hyperlipidemia (E78.5)......

Oncology record

HPI: Patient present for continued follow-up of

Prostate CA diagnosed in 2017. Patient completed radiation therapy in June 2017.....

Last PSA results......

A&P:

Doing well, no residual disease

PSA stable at......

Recheck PSA in 6 months

Problematic documentation: Uncertain terminology¹⁰

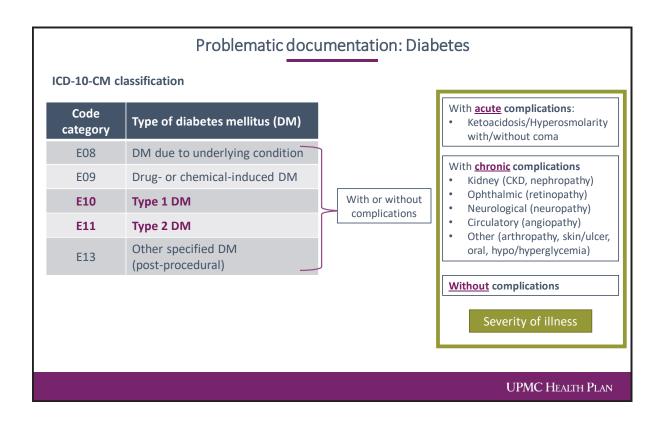
ICD-10-CM terminology making a diagnosis uncertain and therefore ineligible to report:

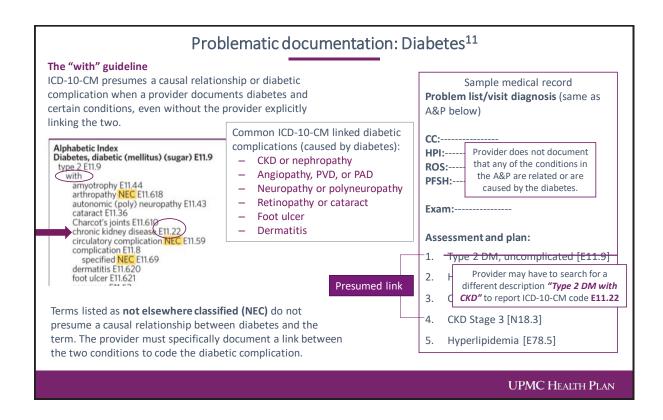
- Probable
- Suspected
- Questionable
- Rule out
- Compatible with
- Consistent with
- Likely
- Working diagnosis
- Other similar terms indicating uncertainty

Uncertain diagnosis (ICD-10-CM section IV.H.)



- Is the condition confirmed?
 - Yes: Do not use these terms anywhere in the record when describing the condition.
 - No: It is OK to document a condition as uncertain (e.g., probable) while working to confirm the diagnosis. Only report the ICD-10-CM code for the symptoms, signs, abnormal test results, or other reason for the visit.





Problematic documentation: Diabetes

ICD-10-CM **does not presume a causal relationship** or diabetic complication for many documented conditions that a provider may diagnose as related.

- The provider must document the conditions as being related to assign the diabetic complication code (e.g., Type 2 DM with other specified complication E11.69).
- Common provider-diagnosed complications (caused by diabetes):
 - Hyperlipidemia
 - Hypertension
 - Coronary artery disease (CAD)
 - Skin ulcer other than foot
 - Obesity

Diabetes with ICD-10-CM "non-presumed" complications

- The EHR description itself may create the documentation link, for example:
 - DM type 2 <u>with diabetic</u> dyslipidemia
 - Dyslipidemia <u>associated with</u> type 2 diabetes mellitus
 - Diabetes mellitus <u>in</u> obesity

Terminology creating a link between the conditions:

- Diabetic
- Associated with
- Due to
- With
- In



Be sure to document an A&P for the associated diabetic condition.

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Terminology creating a link between the conditions:

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- In



Be sure to document an A&P for the associated diabetic condition.

Problematic documentation: Diabetes¹²

As many codes from the diabetes code category should be assigned as needed to report all documented associated diabetic complications being managed, evaluated, assessed, or treated during the encounter.

Example: "Uncontrolled Type 2 diabetes with hyperglycemia, polyneuropathy, and nephropathy" **Codes Assigned:**

E11.42 Type 2 diabetes mellitus with diabetic polyneuropathy **E11.21** Type 2 diabetes mellitus with diabetic nephropathy

E11.65 Type 2 diabetes mellitus with hyperglycemia



- Once a diabetic complication exists, do not report E11.9 (DM uncomplicated).
- Remove the E11.9 (DM uncomplicated) code from the active problem list once a diabetic complication develops.

Problematic documentation: Diabetes

ICD-10-CM classifies uncontrolled diabetes by:

- Type
- With hyperglycemia

E11.641 Type 2 diabetes mellitus with hypoglycemia with coma E11.649 Type 2 diabetes mellitus with hypoglycemia without coma E11.65 Type 2 diabetes mellitus with hyperglycemia

Documented statements of:

- Uncontrolled
- Inadequately controlled
- Out of control
- Poorly controlled

ICD-10-CM alphabetic index classifies to the type with hyperglycemia



- Documentation "not at goal" is not synonymous with uncontrolled.
 - "Type 2 diabetes mellitus not at goal" is reported as uncomplicated diabetes (E11.9).
- Best practice is to document uncontrolled diabetes with hyperglycemia and/or hypoglycemia.
- Documentation for the treatment of an uncontrolled condition should typically show
 a change in the treatment to support that the condition is being addressed during the
 encounter.

Problematic documentation: BMI/Morbid Obesity¹³





BMI value

- Not to be reported for routine capture
- Can be abstracted from ancillary staff notes
 - Must be associated with a <u>provider-documented</u> condition
 - The associated condition must meet the criteria of a reportable diagnosis.
 - Only to be reported as a secondary diagnosis
- Value of the BMI does not define the associated condition code (e.g., morbid obesity)

Associated Condition

- Must meet the criteria of a reportable diagnosis
 - Obesity and morbid obesity are coded based on the provider's documentation, not a BMI value.

Best practice example documentation

Morbid Obesity: BMI remains at 38.9. Discussed lifestyle/dietary changes and possibility of bariatric surgery ...

Problematic documentation: CAD and angina¹⁴

A **causal relationship** can be assumed in a patient with both atherosclerosis (CAD) and angina pectoris, unless the documentation indicates the angina is due to something other than CAD.

125.10 Atherosclerotic heart disease of native coronary artery without angina pectoris

125.110 Atherosclerotic heart disease of native coronary artery with unstable angina pectoris

I25.111 Atherosclerotic heart disease of native coronary artery with angina pectoris with documented spasm

I25.118 Atherosclerotic heart disease of native coronary artery with other forms of angina pectoris

I25.119 Atherosclerotic heart disease of native coronary artery with unspecified angina pectoris

(ICD-10-CM has codes to report CAD in a bypass graft and/or transplanted heart.)



- Native artery is the default site if not otherwise specified.
- Stable angina is coded as "other form."
 - Do not miss opportunities to document and code CAD with angina (even stable), as these codes risk-adjust.
- Support angina with documentation of:
 - "Angina currently asymptomatic, will continue to monitor; use nitroglycerin as needed."

Problematic documentation: Status conditions

- Frequently missed reported status conditions: Ostomies, transplants, amputations
- Often, PCPs will maintain they "do not treat the condition"; therefore, there is no documentation conveying
 the condition was addressed during the encounter.

Ostomies

- If a temporary ostomy, do not report the ICD-10-CM status code after it is reversed.
- Document an assessment of the stoma in the physical exam.

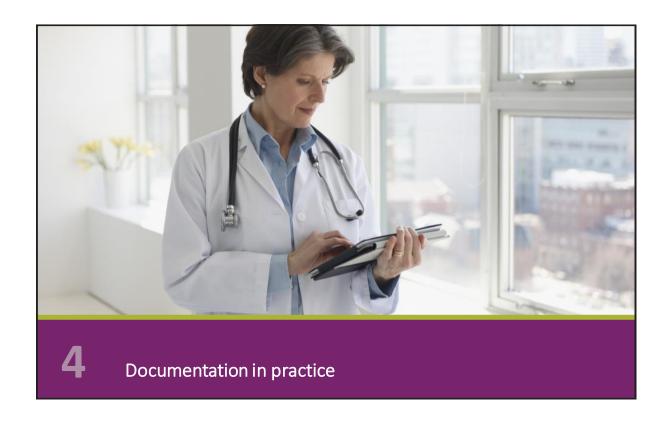


Transplants

- Although the condition is not actively being treated, the condition may affect the care provided.
 - For example, certain medications may not be indicated for a transplant patient, thus
 increasing the level of medical decision making of the provider.
- Document an assessment (e.g., "no problems") and compliance with the transplant team managing the care.

Amputations

• Document an assessment of the stump in the physical exam.



Documentation in practice

History of present illness (HPI)/Review of systems (ROS):

She does have a history of a DVT in the lower extremities, as well as a history of paroxysmal atrial fibrillation. She had been on long-term anticoagulation therapy with Eliquis but did have a lower GI bleed in the recent past and this was discontinued. She does remain on aspirin therapy. History of coronary artery disease with a fairly recent non-ST elevation MI and congestive heart failure. Presently stable. Remainder 14-point review of systems is negative.

Exam/Objective:

LUNGS: Slightly decreased breath sounds bilaterally, otherwise clear. No rales, no wheezing. HEART: Irregularly irregular with controlled ventricular response. Heart tones are somewhat distant. She is in atrial fibrillation.

Assessment and plan:

Chronic atrial fibrillation with controlled ventricular response. On aspirin therapy because of a lower gastrointestinal bleed while on formal anticoagulation.

Plan: Continue same medications except we will restart her sertraline 50 mg at bedtime and increase her furosemide to alternating 20 mg with 40 mg every other day. Order complete laboratory profile and notify her of the results when available. Because of her deteriorating condition, I will make a home visit in three months or sooner.

- Using "history of" terminology in generalized terms for conditions listed in the record.
- · Without a clear A&P makes it hard to determine if the condition is active and addressed during the encounter.

Documentation in practice

Visit diagnoses:

Type 2 Diabetes, uncontrolled Hypertension

E11.65

History of present illness (HPI): States that he had to go to the ER a couple months ago as his blood pressure was over 200 systolic. His wife does monitor his blood pressure and heart rate twice a day. Current readings have been ranging from 86/40 up to 160/70. No edema in his lower extremities. Wife states his blood sugars are stable and doing well. No hypoglycemia.

Exam: Nothing pertinent

Assessment and plan:

- 1. Type 2 diabetes, uncontrolled—Continue with Levemir and Ozempic. We will check HgA1c.
- 2. Hypertension—Change dosage of BP medication ...

Uncontrolled/Unstable/Exacerbated condition should have a documented change in treatment.

Documentation in practice

Visit diagnoses:

Type 2 diabetes with nephropathy

E11.21

History of present illness (HPI):

61-year-old male past medical history of morbid obesity, diabetes mellitus poorly controlled. His diabetes is poorly controlled, with his last hemoglobin A1c above 10. Did review his diet. He reports that he is doing less snacking. Sugars are coming down. Fasting 180–200 range, lowest 180.

Review of systems (ROS): Nothing pertinent

Exam: Nothing pertinent

Assessment/Plan:

- 1. Type 2 diabetes with nephropathy [E11.21]: Hemoglobin A1c (11.2) not at goal. We did discuss diet. He is on a regimen that includes metformin 500 mg by mouth twice a day glipizide 10 mg twice a day Lantus 45 units twice a day Trilisate 1.5 MG every 7 days with not much improvement in his sugars. Increase metformin to 1000 mg twice a day as tolerated. Prior to next visit, check CMP, lipids, hemoglobin A1C.
 - Documentation supports "uncontrolled diabetes" (E11.65 Type 2 DM with hyperglycemia).
 - A&P for diabetes is well documented, nephropathy not documented as addressed.

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HPI:

Primary hyperparathyroidism. Had been seen by Dr. _____, who told her she did not need surgery. Has had a parathyroid scan with no adenoma seen. In my opinion, she has hyperparathyroidism. We discussed that she likely has hyperparathyroidism, but she does not want surgery, so she does not further investigation. Discussed to monitor for signs/symptoms of hypercalcemia. She is not on Lasix.

Exam: Nothing pertinent

Assessment/Plan:

Primary hyperparathyroidism. Her labs are compatible with primary hyperparathyroidism, despite the lack of adenoma seen on scan. Will await updated levels. At the visit, we discussed that she should seek endocrinology consultation for further evaluation. The patient reports she would decline surgery anyway and does not want to seek consultation at this time. Since her symptoms are improved, we will continue to monitor.

• Uncertain terminology is used to make the diagnosis a non-reportable diagnosis.



UPMC Health Plan Risk Adjustment/HCC Physician Educator team



- The regional team is a resource for provider documentation improvement and ICD-10-CM code assignment.
- Physician educators are assigned to sites based on higher enrollment of patients in Medicare Advantage and ACA plans.
- Face-to-face education encounters are the main goal, but encounters can occur telephonically or virtually.



Face-to-face education coverage



Telephonic education coverage

Physician educators provide:

- Practice progress of HCC capture via monthly reporting.
- Time-friendly (20-30 minute) documentation and coding trainings for problematic diagnoses.
- ICD-10-CM coding tools or "cheat sheets."
- Diagnosis/HCC chart reviews for educational purposes focused on:
 - Missed diagnoses/HCC opportunities.
 - Unsubstantiated diagnoses (not supported in the medical record documentation).
 - Provider documentation improvement.
 - Coding education/guidelines.

PROVIDER ONLINE As a participating provider, you can access valuable information online via Provider OnLine. Provider OnLine Login Username Log In If you forgot your user ID or need assistance, please call our Help Desk at 1-800-937-0438. First-time users can create a Provider OnLine account below. To learn how to register, watch our instructional Provider OnLine registration video. Register for Provider OnLine Watch and Learn More About Provider OnLine

Numerous diagnosis-specific coding tools or "cheat sheets" are available to network providers and can be downloaded to assist with

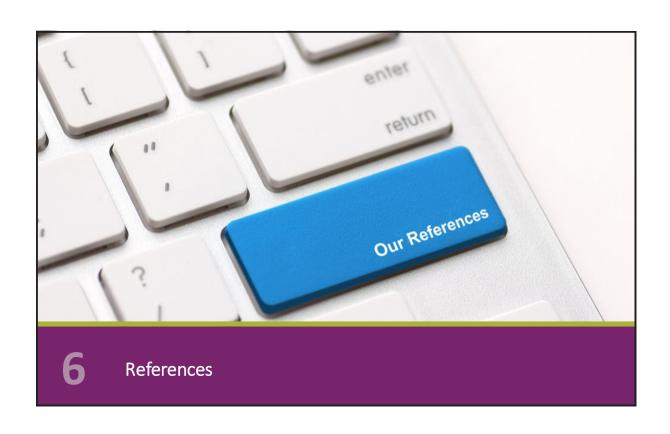
documentation and ICD-10-CM code reporting.

Visit our website,

UPMC Health Plan: Provider OnLine



- Click the link above or go to upmchealthplan.com/providers.
- Log in to or register for Provider OnLine.
- You will land on the Provider OnLine homepage.
- In the left-hand navigation menu, click **Documents and Forms.**
- Scroll down to HCC Risk Adjustment for Coding Tools.



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- ⁴CPT Evaluation and Management (E&M) Office or Other Outpatient (99202-99215) and Prolonged Services (99354, 99355, 99356, 99417) Code and Guideline Changes.
- ⁵2022 ICD-10-CM Official Guidelines for Coding and Reporting. Section IV.J. Centers for Medicare and Medicaid Services. cms.gov/files/document/fy-2022-icd-10-cm-coding-guidelines.pdf

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- 13 References pertaining to Obesity, Morbid Obesity, and BMI. American Hospital Association, Coding Clinic Advisor, 4th Quarter 2018.

Notes



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