

Medical record

2021 E/M Case Study

How the Latest Changes
May Impact Your Practice



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Background:

New requirements for Office/Outpatient E/M services went into effect Jan. 1, 2021. A large hospital system (with more than 6,000 physicians in all specialties) partnered with AAPC Audit Services to discover how the new guidelines would impact their organization. In advance of the audit,

the organization provided rigorous clinical documentation training — based on the 2021 E/M calculations — to their physicians and other non-physician providers.

*Case study was performed in July 2020



Goal

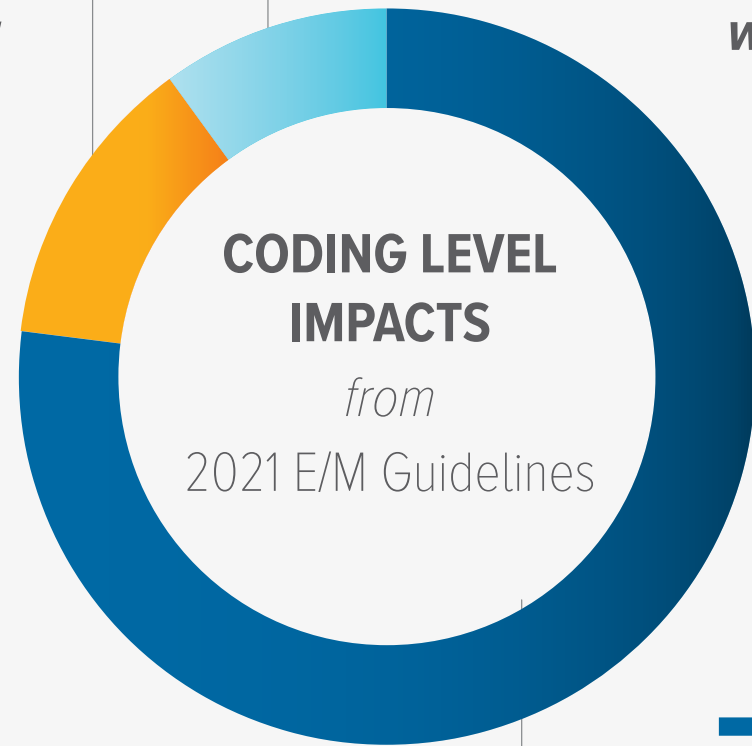
Discover how their current documentation would hold up to the new E/M guidelines.

Action

- Simultaneously with their regular compliance audit, AAPC's team of auditors applied the 2021 criteria and identified whether the E/M level remained the same, went up, or went down based on their providers' current documentation.
- Since Office Visit code levels will be assigned by using either medical decision making (MDM) or time starting in 2021, both calculations were applied to ensure best results.
- A standard sample size of ten dates of service for each provider was used.



13%
were lower



10%
were higher

77%
did not change

Impact

- Each provider audited received individual results for their 2021 comparison.
- In addition to the individual provider impact, the organization received a summary of the overall E/M comparison and financial impact by practice, which assisted them in knowing which providers and/or practices to focus additional trainings.
- The results demonstrated that the guideline change will result in changing reimbursement.
 - **77% of the E/M services did not change**
 - **13% of the E/M services were lower**
 - **10% of the E/M services were higher**

MDM impact

The impact is greatest with specialty practices. AAPC Audit Services found that many of the reported 99204 and 99214 codes supported a 99205 and 99215 E/M service using the 2021 calculation. Additionally, many 99212 codes supported a moderate MDM resulting in 99214 visit level.

The impact was lower with Primary Care providers, including Pediatrics. A new problem to the examiner requiring prescription drug management will no longer automatically support a moderate level MDM. The change in the definitions for the acuity of the problem (acute or chronic) now defines the Complexity of the Problem(s) Addressed rather than being a new or established problem to the provider. Additionally, multiple stable chronic conditions are still likely to support a moderate MDM level.

The physician should document their thought process. While auditors will no longer count ‘bullet points,’ the documentation will need to clearly demonstrate the complexity of the care both provided as well as considered.

Time

The biggest impact when using time to select an E/M level is twofold. First, the guideline no longer requires total face-to face time with of greater than 50% spent counseling and/or coordination of care. Secondly, the required times have changed. For example, a 15-minute established patient visit coded on time is 99212.

For all specialties, the case study found many instances in which the total visit time was not documented, however based on the physician note, it appeared that significant time was spent with the patient. The new guidelines include all the physician’s time including preparing to see the patient, face-to-face time and time spent ordering and documenting the service.

The physician should be mindful of their total time evaluating the patient and include evidence of this in their note before signing off.

The Takeaway:

- A comparison audit is a cost-effective way to understand where you might have documentation gaps and how to prepare for upcoming changes. The results shed light on where to spend your efforts on additional education and training, and which adjustments, if any, need to be made within your organization.
- The gold standard for compliance documentation and coding audits is to audit, educate and re-audit.





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If you have questions about the E/M changes, are interested in a compliance audit, or are looking for customized training, AAPC Audit Services can help. Reach out today by email, phone or at aapc.com/business/

