

WSMA Practice Alerts – *The WSMA Practice Resource Center has useful information on practice operations and services to help you with your daily activities. Please review those materials, and share this communication with colleagues. For details and weblinks, go to www.wsma.org/practice_resource_center*
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Medicare Policy on Consultations

The imminent policy change by the Centers for Medicare and Medicaid Services (CMS), eliminating the use of "consultation" codes (except for limited telemedicine situations) in the Medicare program as of January 1, 2010, is causing serious concerns. As of January 1, physicians are to report those services to Medicare patients, which previously would have been designated as consultations, as E/M services such as Office Visits, Initial Hospital Care, and Subsequent Care.

While consultations still exist as coding options in the AMA's *CPT Manual*, CMS is redistributing the relative value units (RVUs) associated with consultations across other office and hospital evaluation and management (E/M) services, in a "budget neutral" manner. CMS issued *MedLearnsMatters* and claims instructions for Medicare contractors, available through the [WSMA Practice Resource Center](http://www.wsma.org/practice_resource_center). If you have specific questions regarding these changes please contact the [WSMA Coding Hotline](http://www.wsma.org/coding_hotline).

CMS Delays Implementation of New Policies for Ordering/Referring Providers' Revalidation

CMS delayed until April 5 its revalidation initiative, which requires ordering/referring providers to be enrolled in the Medicare Provider Enrollment, Chain and Ownership System (**PECOS**). Implementation was originally scheduled for January 4. For details, see [Change Request 6417](#) and [CR 6421](#) on the WSMA's website.

These policies would deny Medicare reimbursement to Part B providers who are not enrolled in PECOS. Providers who enrolled in Medicare prior to 2003 who have not completed the revalidation process are not included in PECOS. Therefore, physicians may need to revalidate their enrollment with Medicare.

As a physician, other practitioner or supplier, you are encouraged to review your current enrollment information for accuracy on Medicare PECOS: <https://pecos.cms.hhs.gov/pecos/login.do>. Have your National Practitioner Identifier (NPI) number available, and if you have problems in logging in, contact the External User Services (EUS) Help Desk at 866.484.8049 or via email at EUSupport@cqi.com.

Medicare Recovery Audit Contractor (RAC) - Update

The Medicare Recovery Audit Contractors (RACs) are ramping up activities in reviewing Medicare claims submitted by physicians and hospitals, which in some cases could result in refund requests. If you have received a RAC request and have questions, contact the [WSMA Coding Hotline](http://www.wsma.org/coding_hotline). Instructional materials and archived recording of the "RAC Outreach Session" is available at the [WSMA Practice Resource Center](http://www.wsma.org/practice_resource_center).

The new RACs are ramping up activities in reviewing Medicare claims submitted by physicians and hospitals, which in some cases could result in refund requests. The WSMA is monitoring information provided by CMS and HealthDataInsights, Inc. and will push out information regarding audit activities as that information becomes available. At this time, the RAC for Washington state is performing reviews that relate to automated coding based audits rather than complex audits or medical necessity which require submission of chart notes.

On July 20, the WSMA and the state hospital association co-sponsored *free* morning and afternoon conferences on the Medicare Recovery Audit Contractor initiative. Participants heard presentations from CMS Central Office and Health Data Insights (HDI) and its subcontractor PRG Schultz for Region D. Instructional materials on the Medicare RAC initiative are available at the [WSMA Practice Resource Center \(\[www.wsma.org/practice_resource_center/health-insurers.cfm\]\(http://www.wsma.org/practice_resource_center/health-insurers.cfm\)\)](http://www.wsma.org/practice_resource_center/health-insurers.cfm). A recording of the conference also is available there - select "RAC Outreach Session Video." For questions, contact Bob Perna (rjp@wsma.org).

Your Medicaid Claims May Not Get Paid! Unless...

Getting ready for *Medicaid's new ProviderOne system* may take your practice longer than you anticipate, and the process is quite complex as well. To successfully submit electronic claims for payment, practices need to use three new identifiers that require specific electronic format changes to your system, and you must conduct successful testing of those changes before being able to submit HIPAA compliant electronic transactions.

CMS approved funding for three months of expanded testing. Based upon that approval, DSHS anticipates a go-live date in early April 2010. That announcement and details are available on the DSHS website at: <http://hrsa.dshs.wa.gov/providerone/providers.htm>. For questions, email providerone@dshs.wa.gov or call 1.800.562.3022 (select "2," then Option "4"). DSHS is also offering webinars – register at <http://hrsa.dshs.wa.gov/providerone/ScheduledWebinars.htm>.

FTC Red Flags Rule Enforcement Delayed – Again – to June 1, 2010

The Federal Trade Commission (FTC) has announced it again will delay enforcement of its "Red Flags" Rule, this time until June 1, 2010. The rule is an anti-fraud regulation, requiring "creditors" and "financial institutions" with covered accounts to implement programs to identify, detect, and respond to the warning signs, or "red flags," that could indicate identity theft. ***The FTC considers physicians' practice to be covered under the rule.*** Therefore, practices are encouraged to *act now* to implement these requirements.

Get the archived recording of WSMA's free webinar and other information at the *Practice Resource Center* under Identity Theft. Also, you can download a sample Policy and Procedure from the WSMA Policy and Procedure Compendium. – that document is in Word format so that you can amend it as desired.

Upcoming Practice Management Seminars / Webinars / CEUs

For details and registration information on all WSMA seminars and webinars, visit our webpage at http://www.wsma.org/practice_resource_center/practice-management-seminars-ceus.cfm.

New Webinar: Embezzlement Prevention

Embezzlement of practice funds by trusted staff members can go undetected for months, and even years. It's sad but true that in difficult economic times, temptation only grows! Learn how to detect and prevent embezzlement at your practice. The January 20th webinar is restricted to physicians and practice administrators.

New Webinar: Medical Quality Assurance Commission – Disciplinary & Other Licensure Issues

The WSMA will host a January 29th webinar on MQAC and its operations, with guidance on how physicians and staff can avoid violations of state law and achieve compliance with those regulations.

To register online, go to the *Practice Resource Center* at www.wsma.org (under Practice Management Seminars/CEUs). To register by phone, contact Jenelle Dalit at 206.441.9762 or 1.800.552.0612 (email: jcd@wsma.org). ***One registration fee per phone line lets your entire staff listen in.***