


Are You Billing the New PT and OT Evaluation Codes Properly?

HCCA COMPLIANCE INSTITUTE
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Presenters



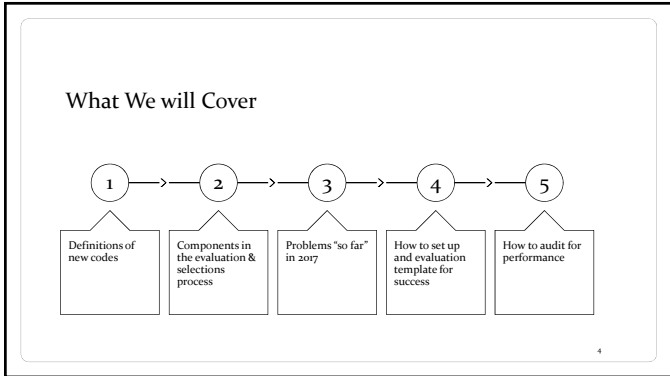
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Objectives

- Understand definitions of new PT and OT evaluation codes
- Learn the components that will determine the level of the evaluation code billed
- Take away an audit tool to ensure your therapy department's compliance



New Evaluation Codes

WHO, WHAT, WHEN, WHERE AND WHY

Physical Therapy Eval Codes

New CPT	Description	Personal Factors & Comorbidities	Body Structures & Functions, Activity Limitations, Participation Restrictions	Stability	Clinical Decision Making	Typical Face to Face Time
97161	Low Complexity Eval	None	1-2	Stable	Uncomplicated	20 minutes
97162	Moderate Complexity Eval	1-2	3 or more	Evolving	Moderate complexity	30 minutes
97163	High Complexity Eval	3 or more	4 or more Elements	Unstable	Unpredictable Clinical Presentation	45 minutes

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Personal Factors: such as sex, age, coping styles, social background, education, and overall behavior patterns that may influence how disability is experienced by the individual

Comorbidities that impact current function and ability to progress through a plan of care

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Body Functions: Physiological functions of body systems (including psychological functions).

Activity: Execution of a task or action by an individual.

Participation Restrictions: Problems an individual may experience in involvement in life situations

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Fluctuation in pain, fluctuating patient reported outcomes and functional tests, variable response to activity/prior treatment

Frequent acute episodes

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Occupational Therapy Eval Codes: "Questions"

New CPT	Description	Performance Deficits	Clinical Decision Making	Comorbidities Affecting Occupational Performance	Modification or Assistance to Complete Eval	Approximate Face to Face Time
97165	Low Complexity Eval	1-3	Low complexity	None	None	30 minutes
97166	Moderate Complexity Eval	3-5	Moderate complexity	Maybe	Min-Moderate	45 minutes
97167	High Complexity Eval	5 or more	High complexity	Yes	Max	60 minutes

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Occupational Therapy Eval Codes

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Contrasting PT & OT Evaluation Complexity

	PT	OT
History	Personal Factors and comorbidities as they affect the plan of care	Occupational Profile, including review of medical and/or therapy records Comorbidities as they affect occupational performance
Clinical Decision Making	Using standardized instruments and measureable assessment of functional outcome	Includes an analysis of the occupational profile, problem focused assessment and consideration of treatment options
Clinical Findings	<ul style="list-style-type: none"> Body Structures and Functions Activity Limitations Participation Restrictions Using standardized tests and measurements	<ul style="list-style-type: none"> Physical Cognitive Psychosocial Skills As related to current functional performance
Clinical Presentation	Stable? Evolving? Unstable; Unpredictable	Degree of modification of tasks or assistance necessary to enable patient to complete evaluation

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PT Evaluation Process

- History
 - Personal factors, comorbidities
- Examination of body systems
 - Body structures & functions, activity limitations, participation restrictions
- Clinical presentation
 - Stable, evolving, unstable
- Clinical decision making
 - Complexity in plan of care

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OT Evaluation Process

- Occupational Profile & history
 - Record review
 - Review PLOF w/patient (physical, cognitive, psychosocial)
- Assessment
 - Identify impairments (physical, cognitive, psychosocial)
- Clinical decision making
 - Level of assessment
 - Number of treatment options
 - Task Modifications

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ICF Definitions

- **Body functions** - The physiological functions of body systems (including psychological functions).
- **Body structures** - Anatomical parts of the body such as organs, limbs and their components.
- **Impairments** - Problems in body function and structure such as significant deviation or loss.
- **Activity** - The execution of a task or action by an individual.
- **Participation** - Involvement in a life situation.
- **Activity limitations** - Difficulties an individual may have in executing activities.
- **Participation restrictions** - Problems an individual may experience in involvement in life situations.
- **Environmental factors** - The physical, social and attitudinal environment in which people live and conduct their lives. These are either barriers to or facilitators of the person's functioning.

Source: WHO 2000 R,10 21

ICF Definitions

- Functioning is an umbrella term for **body function, body structures, activities and participation**. It denotes the positive or neutral aspects of the interaction between a person's health condition(s) and that individual's contextual factors (environmental and personal factors).
- Disability is an umbrella term for impairments, activity limitations and participation restrictions. It denotes the negative aspects of the interaction between a person's health condition(s) and that individual's contextual factors (environmental and personal factors).

Source: WHO 2001:8,10 22

ICF Components and Domains/Chapters

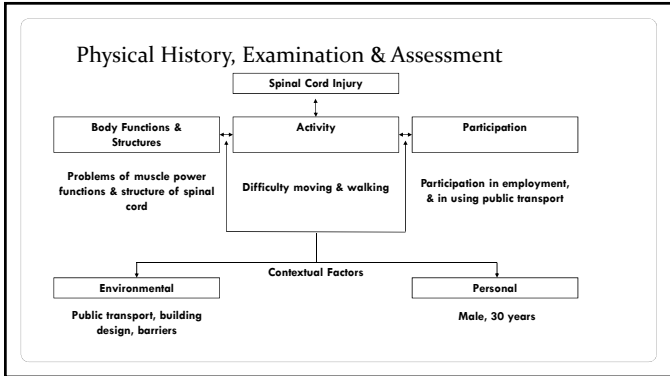
The diagram consists of four rounded rectangular boxes arranged in a 2x2 grid. The top-left box is labeled 'Body Function', the top-right is 'Body Structure', the bottom-left is 'Activities & Participation', and the bottom-right is 'Environmental Factors'. Double-headed arrows connect the boxes horizontally and vertically, indicating interaction between components.

Source: WHO 2001:29-30 23

Physical History, Examination & Assessment

The flowchart starts with a box 'Health Condition, Disorder or Disease' at the top. An arrow points down to a box 'Activity'. To the left of 'Activity' is a box 'Body Functions & Structures', and to the right is 'Participation'. Double-headed arrows connect 'Activity' to both 'Body Functions & Structures' and 'Participation'. Below 'Body Functions & Structures' is 'Normal Variation' with a downward arrow to 'Complete Impairment'. Below 'Activity' is 'No Activity Limitation' with a downward arrow to 'Complete Activity Limitation'. Below 'Participation' is 'No Participation Restriction' with a downward arrow to 'Complete Participation Restriction'. A box 'Contextual Factors' is positioned below 'Complete Activity Limitation', with arrows pointing up to it from 'Complete Impairment' and 'Complete Participation Restriction'. Below 'Contextual Factors' are two boxes: 'Environmental' on the left and 'Personal' on the right, with arrows pointing up to 'Contextual Factors'.

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Auditing for Compliance

UPCODING, UNDERCODING AND WHO KNOWS HOW TO CODE?

- Why?
- Ensure billed code is supported by the documentation
 - Identify needed changes in your EMR to support the codes
 - Identify additional education focus areas related to the codes

When?

- For the first year of implementation of these codes, CMS has decided not to revise Medicare Benefits Policy Manual to reflect the new codes and has instructed auditors to hold off on audits for this first year

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How?

- Develop an audit tool based on code definitions
- Test your tool!
 - IRR if multiple auditors
- Determine audit sample size
 - Be Realistic

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LOCATION:	PATIENT NAME:	DOB:	THERAPIST:
History	Total # Checks	Check all IMPACTING POC. If not impacting POC, then do not check: <input type="checkbox"/> Comorbidity 1 <input type="checkbox"/> Comorbidity 2 <input type="checkbox"/> Comorbidity 3 <input type="checkbox"/> Sex <input type="checkbox"/> Age <input type="checkbox"/> Coping Style <input type="checkbox"/> Social Background <input type="checkbox"/> Education <input type="checkbox"/> Employment <input type="checkbox"/> Careg (Current Experience) <input type="checkbox"/> Release Factors <input type="checkbox"/> Character	
Examination	Total # Checks	Body Systems: Musculoskeletal (Symmetry, ROM, Strength, Height, Weight, Pain, Posture): <input type="checkbox"/> Head <input type="checkbox"/> Neck <input type="checkbox"/> Back <input type="checkbox"/> ME <input type="checkbox"/> UE <input type="checkbox"/> Trunk Neurovascular: <input type="checkbox"/> Balance <input type="checkbox"/> Gait/Locomotion <input type="checkbox"/> Transfers <input type="checkbox"/> Bed Mobility <input type="checkbox"/> Patient Control/Training Cardiovascular/Pulmonary (SBP, RR, Edema) <input type="checkbox"/> Integumentary (Wound/Healed/Unhealed, Skin Function, Color, Integrity, Swell) <input type="checkbox"/> Other (Ability to Make Needs Known, Consciousness, Orientation, Learning Performance, Expected Behaviors/Emotional Response) Activity Limitation: <input type="checkbox"/> Bed Mobility <input type="checkbox"/> Transfers <input type="checkbox"/> Locomotion Level <input type="checkbox"/> Stairs <input type="checkbox"/> Bathing <input type="checkbox"/> Dressing <input type="checkbox"/> Toileting <input type="checkbox"/> Self Feeding <input type="checkbox"/> Hygiene/Toileting <input type="checkbox"/> Reading/Overhead <input type="checkbox"/> Climb <input type="checkbox"/> Climb <input type="checkbox"/> Stair <input type="checkbox"/> Carry <input type="checkbox"/> Stand <input type="checkbox"/> Sleep <input type="checkbox"/> M <input type="checkbox"/> Continence <input type="checkbox"/> Other Participation Restrictions: <input type="checkbox"/> Work <input type="checkbox"/> School <input type="checkbox"/> Church <input type="checkbox"/> Community Activity <input type="checkbox"/> Drive <input type="checkbox"/> Volunteer <input type="checkbox"/> Interpersonal Relationship <input type="checkbox"/> Meal Prep <input type="checkbox"/> Cleaning <input type="checkbox"/> Shop <input type="checkbox"/> Laundry <input type="checkbox"/> Medication Admin <input type="checkbox"/> Personal Hygiene <input type="checkbox"/> School <input type="checkbox"/> Other	
Clinical Presentation		<input type="checkbox"/> Stable/Asymptomatic <input type="checkbox"/> Evolving with Changing Characteristics <input type="checkbox"/> Unstable & Unpredictable Course	
Code	History	Examination	Clinical Presentation
Low complexity - 97161	<input type="checkbox"/> None	<input type="checkbox"/> 1-2	<input type="checkbox"/> Stable/Uncomplicated <input type="checkbox"/> Low
Moderate complexity - 97162	<input type="checkbox"/> 1-2	<input type="checkbox"/> 3+	<input type="checkbox"/> Evolving with <input type="checkbox"/> Moderate
High complexity - 97163	<input type="checkbox"/> 3+	<input type="checkbox"/> 4+	<input type="checkbox"/> Changing Characteristics <input type="checkbox"/> High
PT EVALUATION CODES SUPPORTED: <input type="checkbox"/> 97161 (Low) <input type="checkbox"/> 97162 (Moderate) <input type="checkbox"/> 97163 (High)			

PT: History

Check all IMPACTING POC, if not impacting POC then do not check:

Comorbidity 1 Comorbidity 2 Comorbidity 3

Sex Age Coping Style Social Background Education

Profession Past / Current Experience Behavior Pattern Character

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PT: Examination

Body Systems/Structure/Function:

Musculoskeletal (Symmetry, ROM, Strength, Height, Weight, Pain, Posture):

Head Neck Back LE UE Trunk

Neuromuscular:

Balance Gait/Locomotion Transfers Bed Mobility

Motor Control/Learning

Cardiovascular/Pulmonary (HR, RR, BP, Edema)

Integumentary (Pliability (texture), scar formation, color, integrity, wound)

Other (Ability to Make Needs Known; Consciousness; Orientation; Learning Preference; Expected Behavioral / Emotional Response)

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PT: Examination

Activity Limitation:

Bed Mobility Transfers Locomotion Level Stairs Bathing

Dressing Toileting Self Feeding Hygiene/Grooming

Reaching Overhead Bend Squat Lift Carry Stand

Sleep Sit Continence Other

Participation Restriction:

Work School Church Community Activity Drive Volunteer Interpersonal Rel'ship

Meal Prep Cleaning Shop Laundry

Medication Mgmt Personal Finances School Other

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PT: Clinical Presentation

- Stable and/or uncomplicated characteristics
 - Signs/symptoms remain localized to body structure/function
- Evolving clinical presentation with changing characteristics
 - Signs/symptoms peripheralizing or changing
 - Weight Bearing changes
- Unstable and unpredictable characteristics
 - Pattern of signs/symptoms difficult to establish
 - Red Flags
 - Medical Issues Impacting – orthostatic

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Location:	Patient Name:	DOB:	Therapist:
Occupational Profile & History	<input type="checkbox"/> Brief History Including Review of Records Relating to Presenting Problem	<input type="checkbox"/> Expanded Review of Records & add'l review of physical, cognitive, psychosocial hx related to current func. performance	<input type="checkbox"/> Review of Records and Extensive Add'l review of physical, cognitive, psychosocial hx related to current func. performance
Assessment (performance deficit(s))	Total # of Checks Body Structure/Function/Postural Skills: <input type="checkbox"/> Balance <input type="checkbox"/> Mobility <input type="checkbox"/> Strength <input type="checkbox"/> Endurance <input type="checkbox"/> FIM <input type="checkbox"/> GAC <input type="checkbox"/> Sensation <input type="checkbox"/> Dexterity <input type="checkbox"/> Vision <input type="checkbox"/> Hearing <input type="checkbox"/> Vestibular <input type="checkbox"/> Proprioception <input type="checkbox"/> Pain <input type="checkbox"/> ROM <input type="checkbox"/> Tone <input type="checkbox"/> Coordination <input type="checkbox"/> Weight		
	Cognitive Skills: <input type="checkbox"/> Attention <input type="checkbox"/> Perception <input type="checkbox"/> Thought <input type="checkbox"/> Understanding <input type="checkbox"/> Problem Solving <input type="checkbox"/> Sequencing <input type="checkbox"/> Learning <input type="checkbox"/> Memory <input type="checkbox"/> Emotional <input type="checkbox"/> Consciousness <input type="checkbox"/> Orientation <input type="checkbox"/> Temperament/Personality <input type="checkbox"/> Energy/Drive		
	Psychosocial Skills: <input type="checkbox"/> Interpersonal Interaction <input type="checkbox"/> Habits <input type="checkbox"/> Routines & Behaviors <input type="checkbox"/> Coping Strategies <input type="checkbox"/> Environmental Adaptation		
Clinical Decision Making	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Problem Focused Assessment <input type="checkbox"/> Detailed Assessment <input type="checkbox"/> Comprehensive Assessment <input type="checkbox"/> Limited # of Treatment Options <input type="checkbox"/> Several Treatment Options <input type="checkbox"/> Multiple Treatment Options <input type="checkbox"/> No Considerables <input type="checkbox"/> May have considerables impacting occupational performance <input type="checkbox"/> Presence of considerables impacting occupational performance <input type="checkbox"/> No Modification of Tasks or assist necessary to complete evaluation <input type="checkbox"/> Min-Max Modification of Tasks or assist with assess necessary to complete eval <input type="checkbox"/> Significant Modification of Tasks or assist with assess to complete eval		
Code:	Occupational Profile & History	Performance Deficit(s)	Clinical Decision Making
Low Complexity - 97165	<input type="checkbox"/> Brief	<input type="checkbox"/> 1-3	<input type="checkbox"/> Low
Moderate Complexity - 97166	<input type="checkbox"/> Expanded	<input type="checkbox"/> 3-5	<input type="checkbox"/> Moderate
High Complexity - 97167	<input type="checkbox"/> Extensive	<input type="checkbox"/> 5+	<input type="checkbox"/> High
OT EVAL CODE SUPPORTED: <input type="checkbox"/> 97165 (Low) <input type="checkbox"/> 97166 (Moderate) <input type="checkbox"/> 97167 (High)			

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OT: Occupational Profile & HX

<input checked="" type="checkbox"/> Brief History Including Review of Records Relating to Presenting Problem	<input type="checkbox"/> Expanded Review of Records & add'l review of physical, cognitive, psychosocial hx related to current func. performance	<input type="checkbox"/> Review of Records and Extensive Add'l review of physical, cognitive, psychosocial hx related to current func. performance
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OT: Assessments (Performance Deficits)

- Body Structure/Function/Physical Skills:
 - Balance Mobility Strength Endurance FMC GMC Sensation
 - Dexterity Vision Hearing Vestibular Proprioception Pain ROM
 - Tone Continence Wound
- Cognitive Skills:
 - Attention Perception Thought Understand Problem Solve Sequencing
 - Learn Memory Emotional Consciousness Orientation
 - Temperament/Personality Energy/Drive
- Psychosocial Skills:
 - Interpersonal Interaction Habits Routines & Behaviors Coping Strategies
- Environmental Adaptations

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OT: Clinical Decision making

Low	Moderate	High
<input type="checkbox"/> Problem Focused Assessment	<input type="checkbox"/> Detailed Assessment	<input type="checkbox"/> Comprehensive Assessment
<input type="checkbox"/> Limited # of Treatment Options	<input type="checkbox"/> Several Treatment Options	<input type="checkbox"/> Multiple Treatment Options
<input type="checkbox"/> No Comorbidities	<input type="checkbox"/> May have comorbidities impacting occupational performance	<input type="checkbox"/> Presence of comorbidities impacting occupational performance
<input type="checkbox"/> No Modification of Tasks or assist necessary to complete evaluation	<input type="checkbox"/> Min-Mod Modification of Tasks or assist with assess necessary to complete eval	<input type="checkbox"/> Significant Modification of Tasks or assist with assess is necessary to complete eval

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Practice Makes Perfect

PT AND OT CASE STUDIES

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Case Study 1

- Patient presents to PT with a new onset CVA with R hemiparesis, swallow dysfunction, and R distal tib/fib fracture as a result of a fall when suffered infarct. Precautions: NWB R LE and thickened liquids.
- Comorbidities include HTN with new medication after CVA requiring close monitoring and knee OA with pain with weight bearing with ID'd need for TKR in future. Patient lives alone in a one story home with a 4 step entry with handrail bilateral, tub/shower combo, laundry in basement.
- No AD/AE prior. Was independent with functional mobility and ADL/IADL. Examination: Strength R UE 2/5; L UE 4/5 and R LE 2/5 except testing prevented by cast; L LE 4-/5. PROM intact.
- Bed mobility with moderate assist. Transfer with slide board with moderate assist. Unable to ambulate. Balance FIST score 8/56. BP: 130/70 rest; 150/75 activity. HR 70 rest and on betablocker. Goal is to return home alone.

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Case Study 2

- 76 year old female admitted following a 3 day hospital stay with new dx of CHF. PMH include diabetes, L TKR 5 yrs post, and renal failure with dialysis. Resides in senior apt with supportive son living nearby.
- PLOF independent in all aspects of mobility and self cares. She was completing simple meal prep, housekeeping, and laundry tasks without difficulty in apartment. Son assisted with shopping, med management and personal finances. SOB with all tasks, O2 at 4L and O2 sat's at 87% with activity requiring frequent rests and max cing on breathing technique.
- She requires mod A for UE/LE dressing, bathing, and toileting tasks. L hand grip 10 pounds and R hand grip 5lbs, overall MMT BLE and BUE 3/5; Barthel 65/100; Berg 25/56. Functional reach 5 inches in stand.
- Pt reports pain at 4/10 in BUE shoulders and BORG scale is 17/20 with all tasks. BP varies 100/90 to 150/100. Weight upon eval 190 pounds with edema noted in BLE. Referral made to ST as slight memory and problem solving issues noted during OT evaluation.

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Case Study 3

- 69 year old female presents to OT for lymphedema evaluation of left UE following mastectomy. Prior to surgery and development of lymphedema was completely independent, working part time data entry for her son's business, babysat grandson 2x/week, attended monthly bookclub, and participated in gardening club.
- Currently she is unable to lift grandson, having difficulty with typing for data entry, notes decreased grip strength, feels clumsy with dressing with buttons and zippers, and has pain 5/10.
- Exam findings include edema, grip strength loss, skin intact, FMC deficits, and ROM loss at elbow, wrist and digits. Treatment plan is MLD and bandaging with HEP instruction.

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Case Study 4

- 69 year old female presents to outpatient PT for evaluation of neck pain and numbness and tingling in face and intermittent dizziness. PMH includes COPD with frequent use of steroids and on O2, rheumatoid arthritis, B TKR requiring continued use of two wheeled walker, and BMI of 44.
- PLOF independent with ADLs, assist with IADLs, ambulatory with two wheel walker, stairs independent with bilateral handrails and socially very active with family and friends.
- Reports since onset of s/s requires assist on stairs tub/shower transfers, LB ADLs and showering due to worsening s/s and fear of falling due to onset of dizziness. In addition she has not been able to attend her social functions with friends/family.
- Due to s/s clinician begins with upper cervical stability tests which are positive resulting in call to physician for orders for imaging.

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Essential References & Tools

- Definitions
- Code descriptions
- APTA
- AOTA
- ICF
- Cheat Sheet
- Audit Tools



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Summary & Q & A

HOW CAN WE HELP YOU?

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What Can You Do?

- 1. Familiarize yourself with the evaluation complexity matrix for PT & OT
- 2. Run through some PT & OT cases studies prior to conducting an audit
- 3. Audit to ensure documentation supports complexity
- 4. Make a cross walk to your EMR

Presenters



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