



POLICY SUBJECT:

EFFECTIVE DATE: 08/12/2011

*Physicians working with Non-Physicians
And Billing for Shared Services*

*To be reviewed every three years by
Compliance and Ethics Committee*

**Policy on Physicians Working with Non-Physician Providers and
Billing for Shared Visits**

Purpose:

This policy defines the rules for billing Shared Visits.

Definitions

1. Non-Physician Providers - Non-Physician Providers (NPPs) are Advanced Registered Nurse Practitioners, Physician Assistants, Clinical Nurse Specialists or Certified Nurse Midwives.
2. Shared Visits - These are E/M visits in the facility-based location where a Sound Physicians' physician and a Sound Physicians' NPP each provide a portion of the face-to-face E/M service to the patient, and each documents his or her own portion of the encounter with the patient. One bill is submitted for the combined work of the two Sound Physicians members.

Policy:

- A. Sound Physicians' physicians provide clinical care in environments in which non-physician providers (NPPs) also provide clinical care. When the NPPs are Sound Physicians' employees, Sound Physicians bills for the services of the NPPs. Unless permitted by an exception under this policy, Sound Physicians bills for services in the name of the physician or NPP who personally provided the care to the patient.

- B. Shared Visit billing may only occur when both practitioners are Sound Physicians' providers, and only for certain Evaluation and Management (E/M) services provided in facility-based locations. Sound Physicians' physicians cannot bill "Shared Visits" when providing services together with a Non Physician Provider (NPP) who is not also a Sound Physicians' provider. Consultations, critical care services, and procedures (major or minor) can never be billed as a shared service between any physician and NPP.
- C. The following requirements must be met to bill a shared visit:
- a. a. The NPP and physician each must see the patient face-to-face on the same day and each must perform and document part of the E/M visit.
 - b. b. The visits must both be conducted in a facility-based location.
 - c. c. The NPP and the physician each must personally document his or her own portions of the face-to-face visit with the patient.
- D. Physicians and NPPs may not "share" procedures or consultations. The physician or NPP personally performing the procedure or consultation is the billable provider. While NPPs may perform nursing services to assist the physician with the physician's personally performed procedures, if the NPP performs a portion of the procedure, even if under the supervision of the physician, the NPP is the billable provider for that procedure. If the NPP personally performs a portion of the procedure, beyond what would reasonably be considered nursing services, the procedure is billed with the NPP as the performing provider.
- E. Physicians may not treat NPPs as residents and bill for services supervised under the Teaching Physician requirements. If the NPP performs a portion of the procedure, even if under the direct supervision and instruction of the physician, the NPP is the billable provider for that procedure. NPPs may not supervise residents and apply the Teaching Physician rules to link to resident notes. The Teaching Physician rules apply only to physicians and residents.
- F. The physician may not delegate activities to the NPP that are outside the scope of the NPP's license or outside the NPP's approved privileges at the facility in which the services are provided. If the service is outside the NPP's scope of license or privileges, the NPP may not review the image or test findings and provide a draft interpretation for the physician. The NPP may not engage in activities that are outside of his or her scope of license or privileges, regardless of whether that activity results in billing.
- G. For diagnostic tests and radiological images, NPPs may review findings and render interpretations so long as such activities are within the scope of their license and privileges. In general, if an NPP reviews images and provides an interpretation, the NPP is the billable provider.

Procedure:

In general, Sound Physicians bills for services under the name of the physician or NPP who personally provides the service or procedure to the patient. There are two exceptions:

- NPPs and physicians may each personally perform a portion of certain Evaluation and Management services in the hospital setting. These services may be billed under either the NPP or the physician so long as both are Sound Physicians' providers; and
- Medical residents and Teaching Physicians may jointly perform services, or the Teaching Physician may supervise the services of the resident when the requirements for Teaching Physician presence and documentation are satisfied. These services may be billed under the Teaching Physician.

1. Guidelines for Submitting a Shared Visit Claim

- a. The visit may be billed under the NPP or physician (not both) using the combination of their individually documented services to support the level of E/M for billing.
- b. If the physician does not see the patient face-to-face, the service cannot be billed by the physician. In these cases, the NPP may bill for his or her personally provided services.

2. Working with NPPs who are not Sound Physicians' Providers - When a Sound Physicians' physician works with a NPP who is not a Sound Physicians' provider, a Shared Visit may not be billed. In these instances, Sound Physicians will bill for the physicians' personally performed and documented work only. For example, if an ARNP who is employed by the facility works with a Sound Physicians' physician to provide an E/M service, the physician can only bill for his or her personally performed and documented work. The ARNP's documentation may not be used to support the service billed.

3. Visits in a Non-Hospital Clinic - When an NPP and physician provide services in a freestanding (non-facility) clinic, the shared visit concept does not apply. In the office or non-facility clinic setting services are provided "incident-to" and those rules that apply.

4. 4. Documenting Medical Necessity - Billing a shared visit requires clear documentation of the medical necessity of both Sound Physicians' providers' involvement in the patient's care.