

A Review of Recent COVID-19 Coding & Billing Guidelines



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Agenda

- 2021 Diagnosis Reporting Updates
- Pertinent Current Procedural Terminology (CPT®) or Healthcare Common Procedure Coding System (HCPCS) Updates
- Reimbursement Issues
- Regulatory Updates

2021 Diagnosis Reporting Update

COVID-19 Related

Diagnosis Code Change

- International Classification of Diseases, 10th Revision, Clinical Modification (ICD-10-CM) updates effective January 1, 2021
- Guidelines updated
 - October 2019-March 2020
 - April 2020-September 2020
 - October 2020-December 2020
 - January 2021
- Be sure you're using the correct guidelines

ICD-10-CM Codes - October 2019

- COVID-19 Positive B97.29 Other coronavirus as the cause of diseases classified elsewhere
- Symptomatic Code the symptoms, R05 Cough
- Asymptomatic Guidance changed August 5, 2020
 - Z03.818 Encounter for observation for suspected exposure to other biological agents ruled out no longer recommended
 - Z20.828 Contact with and (suspected) exposure to other viral communicable diseases
- Sequelae not addressed until later

ICD-10-CM Codes - April 2020

- COVID-19 Positive U07.1 COVID-19
- Symptomatic Code the symptoms, R05 Cough
- Asymptomatic Z20.828 Contact with and (suspected) exposure to other viral communicable diseases
- Sequelae B94.8 Sequelae of other specified infectious and parasitic diseases
 - Documentation must show causality between COVID-19 and the patient's symptoms
 - Causality may not be assumed

ICD-10-CM Codes - October 2020

- Codes remain the same but some guideline updates
- Code only confirmed cases (presumptive removed)
- Screening guideline added
 - During the COVID-19 pandemic, a screening code is generally not appropriate. For encounters for COVID-19 testing, including preoperative testing, code as exposure to COVID-19 (guideline I.C.1.g.1.e).

ICD-10-CM Codes - January 2021

- **Z86.16 Personal history of COVID-19**
- J12.82 Pneumonia due to coronavirus disease 2019
- M35.81 Multisystem inflammatory syndrome
- M35.89 Other specified systemic involvement of connective tissue
- **Z11.52** Encounter for screening for COVID-19
- Z20.822 Contact with and (suspected) exposure to COVID-19

Screening Versus Exposure

(f) Screening for COVID-19

During the COVID-19 pandemic, a screening code is generally not appropriate. Do not assign code Z11.52, Encounter for screening for COVID-19. For encounters for COVID-19 testing, including preoperative testing, code as exposure to COVID-19 (guideline I.C.1.g.1.e).

Coding guidance will be updated as new information concerning any changes in the pandemic status becomes available.

Screening Versus Exposure, Cont

(e) Exposure to COVID-19

For asymptomatic individuals with actual or suspected exposure to COVID-19, assign code Z20.822, Contact with and (suspected) exposure to COVID-19.

For symptomatic individuals with actual or suspected exposure to COVID-19 and the infection has been ruled out, or test results are inconclusive or unknown, assign code Z20.822, Contact with and (suspected) exposure to COVID-19. See guideline I.C.21.c.1, Contact/Exposure, for additional guidance regarding the use of category Z20 codes.

If COVID-19 is confirmed, see guideline I.C.1.g.1.a.

1.C.1.g.1.a. Code only confirmed cases

ICD-10-CM Codes - October 2021

New diagnosis code proposed

- U09.9 Post COVID-19, unspecified
- Establishes causality between condition and COVID-19
- Secondary to patient's condition
 - J96.1- Chronic Respiratory Failure
 - R43.8 Other disturbances of smell and taste
 - List of tabular examples not exhaustive
- Excludes2 note added to B94

CPT®/HCPCS Updates

COVID-19 Related

December 11, 2020

Pfizer-BioNTech Vaccine

91300 Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted, for intramuscular use

0001A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted; first dose

0002A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted; second dose

December 18, 2020

Moderna Vaccine

91301 Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted, for intramuscular use

0011A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 100 mcg/0.5mL dosage; first dose

0012A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 100 mcg/0.5mL dosage; second dose

February 27, 2021

Janssen COVID-19 Vaccine (Johnson & Johnson)

91303 Severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, adenovirus type 26 (Ad26) vector, preservative free, 5x1010 viral particles/0.5mL dosage, for intramuscular use

0031A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, adenovirus type 26 (Ad26) vector, preservative free, 5x1010 viral particles/0.5mL dosage, single dose

Effective Date is EUA Approval (Soon)

AstraZeneca Vaccine

91302 Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, chimpanzee adenovirus Oxford 1 (ChAdOx1) vector, preservative free, 5x1010 viral particles/0.5mL dosage, for intramuscular use

0021A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, chimpanzee adenovirus Oxford 1 (ChAdOx1) vector, preservative free, 5x1010 viral particles/0.5mL dosage; first dose

0022A Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, chimpanzee adenovirus Oxford 1 (ChAdOx1) vector, preservative free, 5x1010 viral particles/0.5mL dosage; second dose

Phase 3 Clinical Trial

- Novavax (NVX-CoV2373)
- Emergency Use Authorization (EUA) approval May 2021
- Two doses, one month apart
- United Kingdom effectiveness
 - 95.6% against the original virus
 - 85.6% against the B.1.1.7 variant
- United States already purchased 100 million doses
- No codes released yet

Future Codes

- MLN Matters® article MM12212
- "...Addition of COVID-19 vaccine and vaccine administration codes. This list includes codes that have been reserved for future use and codes recently implemented:
 - COVID-19 Vaccine Codes Q0201 Q0250
 - COVID-19 Vaccine Administration Codes M0201 M0250..."
- Watch: Codes published but not active

Caution Codes – COVID-19 Convalescent Plasma (CCP)

- International Council for Commonality in Blood Banking Automation established codes for CCP
- They are inventory control codes, not HCPCS codes
 - E9747 Apheresis CONVALESCENT PLASMA|ACD-A/XX/<=-18C|COVID-19
 - E9752 = Thawed Apheresis CONVALESCENT PLASMA|ACD-A/XX/refg|COVID-19
- CCP authorized for inpatient use only

Caution Codes, cont.

CCP administration codes

- XW13325 Transfusion of Convalescent Plasma (Nonautologous) into Peripheral Vein, Percutaneous Approach, New Technology Group
- XW14325 Transfusion of Convalescent Plasma (Nonautologous) into Central Vein, Percutaneous Approach, New Technology Group 5

Telehealth Additions

| Code | Short Descriptor | Status |
|-------|------------------------------|--|
| 92526 | Oral function therapy | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92550 | Tympanometry & reflex thresh | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92552 | Pure tone audiometry air | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92553 | Audiometry air & bone | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92555 | Speech threshold audiometry | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92556 | Speech audiometry complete | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |
| 92557 | Comprehensive hearing test | Temporary Addition for the PHE for the COVID-19 Pandemic— Added 3/30/21 |

Telehealth Additions, cont.

| Code | Short Descriptor | Status |
|-------|------------------------------|---|
| 92563 | Tone decay hearing test | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92565 | Stenger test pure tone | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92567 | Tympanometry | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92568 | Acoustic refl threshold tst | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92570 | Acoustic immitance testing | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92587 | Evoked auditory test limited | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |

Telehealth Additions, cont.

| Code | Short Descriptor | Status |
|-------|------------------------------|--|
| 92607 | Ex for speech device rx 1hr | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92608 | Ex for speech device rx addl | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92609 | Use of speech device service | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92610 | Evaluate swallowing function | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92625 | Tinnitus assessment | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92626 | Eval aud funcj 1st hour | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 92627 | Eval aud funcj ea addl 15 | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |

Telehealth Additions, cont.

| Code | Short Descriptor | Status |
|-------|---------------------------|--|
| 96105 | Assessment of aphasia | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 96125 | Cognitive test by hc pro | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 97129 | Ther ivnti 1st 15 min | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |
| 97130 | Ther ivntj ea addl 15 min | Temporary Addition for the PHE for the COVID-19 Pandemic—Added 3/30/21 |

Reimbursement Issues

COVID-19 Related

COVID-19 Vaccine Administration

- The Centers for Medicare & Medicaid Services (CMS) placed them under the Medicare Vaccine Benefit
 - Claims process with no patient coinsurance amount
- Initially assigned to Ambulatory Payment Classifications
 - First dose 1492 New Technology Level 1B (\$11-\$20)
 - \$15.50
 - Second dose 1493 New Technology Level 1C (\$21-\$30)
 - \$25.50
- APCs do not match CMS COVID-19 Vaccines and Monoclonal Antibodies website

COVID-19 Vaccine Administration

- First dose \$16.94
- Second dose or single dose \$28.39
- Effective March 15, 2021, \$40 per dose
 - No longer dependent upon which dose administered
- New APC assignments effective April 1, 2021
 - 9397 COVID-19 Vaccine Administration Dose 1 of 2
 - 9398 COVID-19 Vaccine Administration Dose 2 of 2 or Single Dose Product
 - \$40
- Rates not in Addenda A/B files separate file on CMS website

COVID-19 Vaccine Claims

- COVID-19 monoclonal antibodies placed under the Medicare Vaccine Benefit
- Submit claim like you would for an influenza vaccine
- Yes, this includes the monoclonal antibody infusion
- No, it does not make sense

Claim Submission

- Revenue code 0771 Preventive Care Services Vaccine Administration
- Diagnosis code Z23 Encounter for immunization
- Diagnosis sequencing varies by Medicare Administrative Contractor (MAC)
- Medicare Advantage patient claims go to Original Medicare through 2021

Claim Submission

- Condition codes
 - A6 VACCINES/MEDICARE 100% PAYMENT
 - M1 Payer Code (Roster billing)
 - DR Disaster Related
 - 91 Service provided as part of an Emergency Use Authorization
 - Any other applicable condition code
- Types of bill 012x, 013x, 022x, 023x, 034x, 072x, 075x, 081x, 082x, 083x and 085x
- Applies to vaccines and COVID-19 monoclonal antibodies

AHA Coding Clinic® Response

- Does the injection/infusion hierarchy apply to the COVID-19 monoclonal antibody treatments, such as M0239 Intravenous infusion, bamlanivimab-xxxx, includes infusion and post administration monitoring?
- Currently, the administration of bamlanivimab via injection or infusion is captured with HCPCS Level II codes and not CPT codes. Therefore, the hierarchy related to drug administration for facility reporting apply does not apply in this case.

AHA Coding Clinic® Response

- If the infusion is discontinued, do you use modifier 52 Reduced Services?
- If the infusion was discontinued due to circumstances that affected the well-being of the patient, it is appropriate to append modifier 52 to code M0239. For facility reporting, modifier -52 is used to indicate partial reduction, cancellation, or discontinuation of services for which anesthesia is not planned.

AHA Coding Clinic® Advisor

- Post COVID-19 syndrome indicates temporality, but not that the current symptom/condition is sequelae of COVID-19.
- Personal history codes explain a patient's past medical condition that no longer exists and is not receiving any treatment, but has the potential for recurrence and may require continued monitoring
- Sequela is the residual effect (condition produced) after the acute phase of an illness or injury has terminated.

AHA Coding Clinic® Advisor

- Emergency Department patient presents with complaints of throat tingling and tightness of chest following COVID-19 vaccine administration, and causal relationship documented
 - T78.49XA Other allergy, initial encounter
 - R09.89 Other specified symptoms and signs involving the circulatory and respiratory systems
 - Do not assign T80.62XA Other serum reaction due to vaccination, initial encounter
 - Vaccines are not serum based
 - If anaphylaxis documented, T80.52XA Anaphylactic reaction due to vaccination, initial encounter

Regulatory Updates

COVID-19 Related

Regulatory Updates

- Public Health Emergency Renewed for 90 days
- Emergency Use Authorization for bamlanivimab-only treatments revoked
- ICD-10 Coordination & Maintenance Committee suggesting updates twice yearly
 - Start April 2022
 - Expected to have fewer codes than the annual release
- CMS COVID-19 Office Hours discontinued
 - COVID-19 issues may be covered in Open Door forum by provider

New Condition Codes

- Effective February 1, 2021
- 90 Service provided as part of an Expanded Access approval
 - Compassionate Use approval
- 91 Service provided as part of an Emergency Use Authorization
 - COVID-19 vaccines, monoclonal antibodies
 - Laboratory tests
 - Supplies, too many to list

Questions?

References

ICD-10-CM Guidelines

https://www.cms.gov/medicare/coding/icd10?redirect=/icd10/ 01_overview.asp#TopOfPage

 ICD-10-CM Coordination & Maintenance Committee Meeting

https://www.cdc.gov/nchs/icd/icd10cm_maintenance.htm

U.S. Food & Drug Administration (FDA) EUA list

https://www.fda.gov/emergency-preparedness-and-response/mcm-legal-regulatory-and-policy-framework/emergency-use-authorization#euaguidance

References, cont.

Centers for Disease Control and Prevention

https://www.cdc.gov/coronavirus/2019-ncov/vaccines/different-vaccines.html

 American Medical Association (AMA), Find Your COVID-19 Vaccine CPT® Codes

https://www.ama-assn.org/find-covid-19-vaccine-codes

MLN Matters® article MM12212

https://www.cms.gov/files/document/mm12212.pdf

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AHA Coding Clinic® Advisor

https://www.codingclinicadvisor.com/faqs-icd-10-cm-coding-covid-19

CMS COVID-19 Vaccines and Monoclonal Antibodies

https://www.cms.gov/medicare/medicare-part-b-drug-average-sales-price/covid-19-vaccines-and-monoclonal-antibodies

Public Health Emergency

https://www.phe.gov/emergency/news/healthactions/phe/Pages/COVID-15April2021.aspx

References, cont.

Lifeserve Blood Center

https://www.lifeservebloodcenter.org/wpcontent/uploads/2020/04/CCP-Information-for-Hospital-Blood-Banks-Updated-05.08.20.pdf

Thank you!