Medicare 2019: What’s Changing for Psychologists

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Director, Regulatory Affairs
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What’s new in 2019

• New coding and billing structure for psychological and neuropsychological testing

• Clinical psychologists added to the Merit-based Incentive Payment System (MIPS)
Background – key terms

Relative value units (RVUs): points used to rank healthcare services based on the resources they require

- Services have 3 RVUs: work, practice expense and malpractice expense

Work: professional’s time and the complexity of the service
Practice expense: overhead
Malpractice expense: liability insurance
Key Testing Code Changes

• No longer billing for each hour of testing under the same code

• Base code for initial unit of test administration or evaluation, followed by add-on code(s) for each unit

• Add-on codes have lower value than base code due to lack of pre- and post-service work

• Technician testing codes have lower value because they no longer include professional work (no work RVUs)
Key testing code changes

• Billing different codes for test administration and evaluation
  ▫ Test evaluation valued higher than test administration
  ▫ Evaluation can only be done by a professional

• Base code for first hour of test evaluation and first 30 minutes of test administration

• Add-on code(s) for each additional hour of test evaluation and for each additional 30 minute of test administration
What the changes represent

• A new way of coding and billing – not just new numbers

• Not a direct crosswalk to the previous testing codes

• No longer have professional work included in the technician testing codes

• Value for professional test evaluation higher than before
2019 PNP Testing Codes

**Neurobehavioral Status Exam** – Clinical assessment of thinking, reasoning and judgement by physician or QHCP, both face-to-face time with patient and time interpreting test results and preparing the report

96116 - 1\textsuperscript{st} hour (base code)

96121 – Each additional hour (add on code)
2019 PNP Testing Codes

Psychological/Neuropsychological Testing Evaluation Services – by physician or other QHCP, including integration of patient data, interpretation of standardized test results and clinical data, clinical decision making, treatment planning, and report and interactive feedback to patient / family
2019 PNP Testing Codes

Psychological Testing Evaluation Codes
96130 – 1st hour of psych testing evaluation (base code)
96131 – each additional hour (add on code)

Neuropsychological Testing Evaluation Codes
96132 – 1st hour of neuropsych testing evaluation (base)
96133 – each additional hour (add on code)
2019 PNP Testing Codes

Test Administration and Scoring by Professional – Psychological and neuropsychological test administration and scoring by physician or QHCP, two or more tests, any method

96136 – first 30 minutes (base code)

96137 – each additional 30 minutes (add on code)
2019 PNP Testing Codes

Psychological or neuropsychological test administration and scoring by technician – two or more tests, any method

96138 – first 30 minutes (base code)

96139 – each additional 30 minutes (add on code)
2019 Computer Testing Code

- **96146** Psychological or neuropsychological test administration with single automated instrument and automated result (PE only)

- If performing more than one test include automated tests under 96136 / 37 (professional) or 96138 / 39 (technician) testing codes

- 96136-39 apply to two or more tests under any method
## 2019 Testing Code Values

<table>
<thead>
<tr>
<th>Code</th>
<th>Service</th>
<th>Non-Fac</th>
<th>Fac</th>
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<tbody>
<tr>
<td>96116</td>
<td>Neuro Behv St Exam, 1\textsuperscript{st} hr</td>
<td>2.70</td>
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<td>96121</td>
<td>NBSE, additional hour</td>
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<td>96130</td>
<td>Psych Test Eval, 1\textsuperscript{st} hour</td>
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<td>Psych Test Eval, add’tl hour</td>
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<td>96132</td>
<td>Nrpsych Test Eval, 1\textsuperscript{st} hour</td>
<td>3.71</td>
<td>3.04</td>
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<tr>
<td>96133</td>
<td>Nrpsych Test Eval, addt’l hour</td>
<td>2.83</td>
<td>2.33</td>
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<table>
<thead>
<tr>
<th>Code</th>
<th>Service</th>
<th>Non-Fac</th>
<th>Fac</th>
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<tr>
<td>96136</td>
<td>Psy/Nrpsych testing, prof, 1&lt;sup&gt;st&lt;/sup&gt; hr</td>
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<tr>
<td>96137</td>
<td>P/NP Testing, prof, addt’l hour</td>
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<td>96138</td>
<td>Psy/Nrpsych testing, tech, 1&lt;sup&gt;st&lt;/sup&gt; hr</td>
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<tr>
<td>96139</td>
<td>P/NP Testing, tech, addt’l hour</td>
<td>1.08</td>
<td>NA</td>
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<tr>
<td>96146</td>
<td>Automated P/NP single test</td>
<td>0.06</td>
<td>NA</td>
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</tbody>
</table>
Previous Psychological Testing Codes

• 96101 Testing by psychologist – Billed by the hour
  • 1.86 work RVUs

• 96102 Testing by technician – Billed by the hour
  • 0.51 work RVUs

• 96103 Testing by computer – Billed only once
2019 Psych Testing by Professional – 3 hours testing and 3 hours evaluation

• 96136 test administration, 1st 30 minutes +
  • 96137 each additional 30 minutes of test administration (5 units) +

• 96130 test evaluation, first hour +
  • 96131 test evaluation, each additional hour (2 units)
Previous Neuropsych Testing Codes

- 96118 Testing by psychologist - 1.86 work RVUs
- 96119 Testing by technician - 0.51 work RVUs
- 96118 & 96119 billed by the hour
- 96120 Testing by computer – Billed only once
Neuropsych testing by tech – 3 hours testing and 3 hours evaluation

- Bill 96138 for first 30 minutes of test administration by a technician (PE only) +
  - 96139 for each addit’l 30 minutes (5 units, PE only) +

- 96132 neuropsychological test evaluation, first hour +
  - 96133 neuropsych test evaluation, each addit’l hour (2 units)
Coverage / Payment Issues

• Third party payers not covering all codes

• Services provided on different days

• No work RVUs for technician testing codes
Resources

APA Services Inc. articles:
https://www.apaservices.org/practice/reimbursement/health-codes/testing

Medicare local coverage determinations
https://www.cms.gov/medicare-coverage-database/
QUESTIONS?

Testing Codes: Office Health Care Financing
Email: OHCF@apa.org

Medicare: Government Relations
Email: pracgovt@apa.org

Private Insurance or Medicaid: Legal & Regulatory Affairs
Email: praclegal@apa.org