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TO: Early Intervention Occupational and Physical Therapy Evaluating Providers

FROM: Ann M. Freiburg, Chief

Bureau of Early Intervention

DATE: February 6, 2017

RE: El Occupational and Physical Therapy Evaluation Code Changes

In November 2016, the Bureau of Early Intervention (EI) was made aware of the announcement released by federal Centers for Medicare & Medicaid Services (CMS) regarding the discontinuation of Occupational Therapy Evaluation CPT Code 97003 and Physical Therapy Evaluation Code 97001 for submitting claims to Medicaid. (Refer to Department of Health and Human Services/Centers for Medicare and Medicaid Services November 10, 2016 MLN Matters: "2017 Annual Update to the Therapy Code List" which can be found at https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM9782.pdf)

The Bureau of EI has collaborated with the Illinois Department of Healthcare & Family Services (HFS) regarding the necessary code changes. HFS received the federal CMS rate schedule for these updated codes in late January 2017 along with an indication that CMS plans to review the new codes next year for any potential updates or changes. This memorandum serves to inform all Evaluating EI Occupational and Physical Therapists that billing for dates of service performed after December 31, 2016 may begin now.

<u>Based on HFS guidance, the Bureau of EI is notifying all evaluating EI Occupational and Physical</u>
<u>Therapy providers that they must follow the guidelines below with respect to all dates of service beginning January 1, 2017.</u>

- El Service Coordinators will continue to provide an authorization for an El Occupational Therapy evaluation using code 97003 and El Physical Therapy evaluations using code 97001.
- The credentialed EI Occupational or Physical Therapy Evaluator will perform the necessary
 evaluation following the new CMS guidance with precise compliance for components separating
 the complexity definition of Low, Moderate or High to be identified within their documentation
 of the evaluation performed.
- The claim submitted to the Central Billing Office (CBO) must be billed as followed:
 - o 96111/Modifier GO for Occupational Therapy Evaluation
 - 96111/Modifier GP for Physical Therapy Evaluation

 As all EI Evaluators must do, include the number of 15-minute units utilized for the process of performing the approved instrument, scoring the approved instrument and writing the required *Illinois Early Intervention Evaluation/Assessment Report Format*.

Remember that document must support the time utilized and the therapist must only bill for time actually used regardless of the time on the authorization. If additional time is needed, the therapist must always contact the EI Service Coordinator to discuss potential adjustments.

• Effective dates of service beginning January 1, 2017

- CBO will deny a claim for Occupational Therapy Evaluation using codes 97003, 97165, 97166,
 97167 or 97168
- CBO will deny a claim for Physical Therapy Evaluation using codes 97001, 97161, 97162, 97163 or 97164
- Claims for dates of service beginning January 1, 2017 must use the appropriate 96111
 Modifier GO for an Occupational Therapy evaluation or 96111 Modifier GP for a Physical Therapy evaluation

The process of authorizing EI Occupational and Physical Therapy Evaluations will not change and EI will continue to use the former codes of 97003 and 93001 to create authorizations.

The Bureau of EI reminds all evaluating providers that the Payee Agreement states compliance with HFS is required and that the claim should reflect the activity of the evaluation. All EI therapists are reminded that submitting claims to populations other than EI must follow any policies/procedures of that plan. Additionally, only the time spent that can be supported by documented activities of the evaluation process should be billed, as it is against policy to round-up time to bill. A written report of the findings of the EI Occupational and Physical Evaluation must continue to be submitted using the required report format.

Finally, it is also important to know these codes with modifiers listed for use in this memorandum are strictly specific to the use of EI Evaluators.

Thank you for your continued service to Illinois EI infants and toddlers!