



HAWAII HEALTH SYSTEMS
C O R P O R A T I O N

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COMPLIANCE ALERT 12-19

CMS Sets Preliminary Decisions on Supervision Levels for Select Services

EXECUTIVE SUMMARY: Based on its final rule (76 Fed. Reg. 74360), CMS issued its proposed changes to the current supervision requirements for several CPT and HCPCS codes. According to CMS, these decisions are preliminary and are open to public comment through October 24, 2012. Comments may be submitted via email to HOPSupervisionComments@cms.hhs.gov. As we indicated in the final rule, we will post final decisions after considering any comments that we receive and those decisions will be effective on January 1, 2013.

DETAILED INFORMATION:

Changes from direct supervision required to general supervision: CMS accepted the Hospital Outpatient Payment Panel's recommendations to change the requirement for the following services from direct supervision to general supervision, "since provision of the service does not typically require the immediate availability of the supervising physician or appropriate non-physician practitioner:

- HCPCS code G0008 *Administration of influenza virus vaccine*
- HCPCS code G0009 *Administration of pneumococcal vaccine*
- HCPCS code G0010 *Administration of hepatitis B vaccine*
- HCPCS code G0127 *Trimming of dystrophic nails, any number*
- CPT code 11719 *Trimming of nondystrophic nails, any number*
- CPT code 36000 *Introduction of needle or intracatheter, vein*
- CPT code 36591 *Collection of blood specimen from a completely implantable venous access device*
- CPT code 36592 *Collection of blood specimen using established central or peripheral catheter, venous, not otherwise specified*
- CPT code 51702 *Insertion of temporary indwelling bladder catheter; simple (e.g., Foley)*
- CPT code 51705 *Change of cystostomy tube; simple*
- CPT code 51798 *Measurement of post-voiding residual urine and/or bladder capacity by ultrasound, non-imaging*
- CPT code 96360* *Intravenous infusion, hydration; initial, 31 minutes to 1 hour*
- CPT code 96361* *Intravenous infusion, hydration; each additional hour (list separately in addition to code for primary procedure)*
- CPT code 96521 *Refilling and maintenance of portable pump*

- CPT code 96523 *Irrigation of implanted venous access device for drug delivery systems*

These above services could be conducted under general supervision in accordance with applicable Medicare regulations and policies.

No changes for the following services: According to CMS, “the service either involves assessment by a physician, or there is a significant potential for patient complications or reactions that would require the supervising physician or appropriate non-physician practitioner to be immediately available.” The following codes still require direct supervision:

HCPCS code G0379* *Direct admission of patient for hospital observation care*

- HCPCS code G9141 *Influenza A (H1N1) immunization administration (includes the physician counseling the patient/family)*
- CPT code 29580 *Strapping; Unna boot*
- CPT code 29581 *Application of multi-layer compression system; leg (below knee), including ankle and foot*
- CPT code 51700 *Bladder irrigation, simple, lavage and/or instillation*
- CPT code 96365* *Intravenous infusion, for therapy, prophylaxis, or diagnosis (specify substance or drug); initial, up to 1 hour*
- CPT code 96366* *Intravenous infusion, for therapy, prophylaxis, or diagnosis (specify substance or drug); each additional hour (list separately in addition to code for primary procedure)*
- CPT code 96367* *Intravenous infusion, for therapy, prophylaxis, or diagnosis (specify substance or drug); additional sequential infusion of a new drug/substance, up to 1 hour (list separately in addition to code for primary procedure)*
- CPT code 96368* *Intravenous infusion, for therapy, prophylaxis, or diagnosis (specify substance or drug); concurrent infusion (list separately in addition to code for primary procedure)*
- CPT code 96372* *Therapeutic, prophylactic, or diagnostic injection (specify substance or drug); subcutaneous or intramuscular*
- CPT code 96374* *Therapeutic, prophylactic, or diagnostic injection (specify substance or drug); intravenous push, single or initial substance/drug*
- CPT code 96375* *Therapeutic, prophylactic, or diagnostic injection (specify substance or drug); each additional sequential intravenous push of a new substance/ drug (list separately in addition to code for primary procedure)*
- CPT code 96376* *Therapeutic, prophylactic, or diagnostic injection (specify substance or drug); each additional sequential intravenous push of the same substance/ drug provided in a facility (list separately in addition to code for primary procedure)*

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Source: 76 Fed. Reg. 74360: *Calendar Year 2012 Outpatient Prospective Payment System /Ambulatory Surgical Center Final Rule* and <http://www.cms.gov/Regulations-and-Guidance/Guidance/FACA/Downloads/Prelim-Supervision-Decisions092412.pdf>